

United States

Environmental Protection Agency



MD 715 Report

Fiscal Year 2015

EEOC FORM 715-01 PART A – D		U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
For period covering October 1, 2014 to September 30, 2015.					
PART A Department or Agency Identifying Information	1. Agency		1. U.S. Environmental Protection Agency		
	1.a. 2 nd level reporting component		N/A		
	1.b. 3 rd level reporting component		N/A		
	1.c. 4 th level reporting component		N/A		
	2. Address		2. 1200 Pennsylvania Avenue, NW		
	3. City, State, Zip Code		3. Washington, D.C. 20460		
	4. CPDF Code	5. FIPS code(s)	4. EP	5. 11	
PART B Total Employment	1. Enter total number of permanent full-time and part-time employees				1. 14,620
	2. Enter total number of temporary employees				2. 946
	3. Enter total number employees paid from non-appropriated funds				3. 0
	4. TOTAL EMPLOYMENT [add lines B 1 through 3]				4. 15,566
PART C Agency Official(s) Responsible For Oversight of EEO Program(s)	1. Head of Agency Official Title		1. Gina McCarthy, Administrator Environmental Protection Agency		
	2. Agency Head Designee		2. Stan Meiburg, Acting Deputy Administrator Environmental Protection Agency		
	3. Principal EEO Director/Official Title/Series/Grade		3. Velveta Golightly-Howell, Director for Office of Civil Rights SES		
	4. Title VII Affirmative EEO Program Official		4. Tina Lancaster, Assistant Director Affirmative Employment, Analysis, and Accountability Program		
	5. Section 501 Affirmative Action Program Official		5. Christopher Emanuel National Disability Employment Program Manager		
	6. Complaint Processing Program Manager		6. Cynthia Darden Assistant Director for Title VII		
	7. Other Responsible EEO Staff		7. Lilian Dorka, Deputy Director Kristin Tropp, Acting National Reasonable Accommodations Coordinator Mirza P. Baig, EEO Manager Jerome King, EEO Manager Kimberly Jones, Management Analyst Jannette Graves, Paralegal Assistant Kenneth Standifer, Student Assistant		

EEOC FORMS and Documents included in this report:			
*Executive Summary [FORM 715-01 <u>PART E</u>], that includes:	X	*Optional Annual Self-Assessment Checklist Against Essential Elements [FORM 715-01 <u>PART G</u>]	X
Brief paragraph describing EPA's mission and mission-related functions	X	*EEO Plan To Attain the Essential Elements of a Model EEO Program [FORM 715-01 <u>PART H</u>] for each programmatic essential element requiring improvement	X
Summary of results of agency's annual self-assessment against MD-715 "Essential Elements"	X	*EEO Plan To Eliminate Identified Barrier [FORM 715-01 <u>PART I</u>] for each identified barrier	X
Summary of Analysis of Work Force Profiles including net change analysis and comparison to RCLF	X	*Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals With Targeted Disabilities for agencies with 1,000 or more employees [FORM 715-01 <u>PART J</u>]	X
Summary of EEO Plan objectives planned to eliminate identified barriers or correct program deficiencies	X	*Copy of Workforce Data Tables as necessary to support Executive Summary and/or EEO Plans	X
Summary of EEO Plan action items implemented or accomplished	X	*Copy of data from 462 Report as necessary to support action items related to Complaint Processing Program deficiencies, ADR effectiveness, or other compliance issues.	X
*Statement of Establishment of Continuing Equal Employment Opportunity Programs [FORM 715-01 <u>PART F</u>]	X	*Copy of Facility Accessibility Survey results as necessary to support EEO Action Plan for building renovation projects	N/A
*Copies of relevant EEO Policy Statements	X	*Organizational Chart	

**EEOC FORM
715-01
Part E - EXECUTIVE SUMMARY**

U.S. Equal Employment Opportunity Commission
**FEDERAL AGENCY ANNUAL
EEO PROGRAM STATUS REPORT**

Agency Mission

The mission of the United States Environmental Protection Agency (Agency or EPA) is to protect human health and the environment. Agency programs and activities are focused on protecting the air we breathe, the water we drink, and the places we live. To accomplish this mission the Agency:

- partners with federal, state, and local stakeholders to enforce the nation's environmental laws and regulations;
- conducts world class research;
- provides financial assistance to state recipients and grantees in support of environmental programs; and
- employs a highly-educated and diverse workforce.

Given the broad scope and critical importance of the Agency's mission, it recognizes that meeting the multitude of responsibilities to the public can only be accomplished with a highly skilled diverse, inclusive, dynamic, and world-class workforce. To that end, the Agency works vigorously to determine what has caused any identified triggers to equal employment opportunity and attract, hire, retain, and promote the most talented individuals in accordance with merit systems principles.

The EPA Office of Civil Rights (OCR) is responsible for carrying out the requirements of Management Directive 715 (MD-715). In order to most efficiently and effectively accomplish this duty, OCR maintains several partnerships across the Agency; however, its primary partnership is with the Office of Administration and Resources Management (OARM). This partnership is critical given that OARM is responsible for the effective management of the Agency's human, financial and physical resources to include race national origin (RNO) data and efforts around diversity and inclusion¹. Moreover, OCR consults with the Office of General Counsel (OGC) who provides legal sufficient reviews of the MD-715 report.

The Agency is pleased to share this brief summary of the programs, activities, and accomplishments for Fiscal Year 2015 (FY 15), which document its multi-year efforts toward building and sustaining a model Equal Employment Opportunity (EEO) program based on the six essential elements identified in the U.S. Equal Employment Opportunity Commission (EEOC) MD-715 guidance.

¹ For purposes of this report, workforce diversity is defined as a collection of individual attributes that together, help the EPA pursue organizational objectives efficiently and effectively. These include, but are not limited to, characteristics such as national origin, language, race, color, disability, ethnicity, gender, age, religion, sexual orientation, gender identity, socioeconomic status, veteran status, and family structures. The concept also encompasses differences among people concerning where they are from, where they have lived and their differences of thought and life experiences.

Results of the Agency's Annual Self-Assessment

The Agency continued to make progress using the principles of the following six essential elements. By reviewing EEO and personnel programs, policies, and performance, the Agency identified areas where EEO programs can be more effective. Significant areas of accomplishment in FY 15 are listed under each element.

❖ Demonstrated Commitment from Agency Leadership

- The FY 14 State of Equal Employment Opportunity was presented to and approved by the Administrator, January 2015. The FY 14 MD-715 Annual Report was submitted prior to the expected deadline to the EEOC, January 2015.
- The following policies and procedures were developed or reaffirmed in FY 15:
 - *EEO Policy Statement* (December 10, 2014).
 - *Anti-Harassment Policy Statement* (December 10, 2014).
 - **OHR provides a process for all policies to be issued to new employees within their first 90 days on board.*
- The National Reasonable Accommodation Coordinator (NRAC) briefed the OCR Director on requests for reasonable accommodations; and regularly discussed with Local Reasonable Accommodation Coordinator (LORACs) compliance with written procedures. In addition, all reasonable accommodation procedures are made available to all new and current employees on the EPA's intranet site at: <http://intranet.epa.gov/civilrights/reasonableaccommodation.htm>.
- Funding was allocated to support EEO programs, training and educational opportunities:
 - *EPA No Fear Act Online Training* was made available to all current and new employees (FY 15).
 - *EPA Employee Training and Development* (July 24, 2015). The Acting Assistant Administrator, OARM issued a memorandum supporting employee training and development across the Agency identifying a number of agency-sponsored learning and professional growth opportunities, approved external training, and highlighted training conferences particularly well suited for Special Emphasis Program Managers.
 - *Senior Executive Service (SES) Pipeline Training* (September 29 and 30, 2015). The Office of Diversity, Advisory Committee Management and Outreach (ODACMO) collaborated with the Office of Human Resources (OHR) Executive Resources Division (ERD) to present two training sessions on the Senior Executive Service (SES) application process; the training also included a panel discussion with current agency SES managers answering questions on their experiences as Senior Executives at EPA.
 - *First-Line Supervisor Pipeline Training* – On September 30, 2015, ODACMO conducted a separate Supervisors Panel for employees who are considering becoming first-line supervisors. The session covered multiple topics, to include transitioning from peer to supervisor; managing non-performers; work-life balance; supervisory training and managing up and down.

- *The OCR Strategic Planning and Leadership Training Conference for EEO Officers I* (October 2014), the first annual leadership training for EPA EEO Officers (EEOOs). This three day training offered the civil rights community an opportunity to discuss the development and implementation of a three year civil rights strategic plan identifying priorities that will further EPA's goal of building a model civil rights program.
- *The OCR Strategic Planning and Leadership Training Conference for EEO Officers II* (August 2015), the second annual leadership training for EPA EEO Officers. This three day training continued to further build upon the strategic planning development and priorities established from the October 2014 training with the civil rights community. This was an opportunity to assess the previously identified key areas and develop new strategies that will continue EPA's goal of building a model civil rights program.
- *The OCR Barrier Analysis Training for EPA EEO Officers and Program Management Officers* (May 14-15, 2015). This training, facilitated by the EEOC, covered all aspects of the required barrier analysis process to include: legal and public policy foundations; analysis and interpretation of workforce statistics found in the specialized MD-715 data tables; trigger identification; barrier analysis investigation; organizing findings and preparing action plans designed to eliminate barriers; follow-up on MD-715 reports from previous reporting cycles; and hands-on simulations of actual situations typically encountered when preparing MD-715 reports.
- *The OCR Basic and Advanced Datamart Training* was offered in two parts over FY 15. Training on data systems will continue in FY 16 for EPA EEO staff. In FY 15 Part I included the DOI/IBC Datamart systems for Human Resources. EEO staff will participate in Datamart EEO Part II and refresher trainings annually. This commitment is to ensure data is consistent across EPA as it relates to both diversity and inclusion and EEO.
- *Special Emphasis Program Managers (SEPM) National Foundational Training* (August 27, 2015). The OCR, in collaboration with ODACMO, developed a plan strategically designed around the shared function of strengthening EPA special emphasis programs. This resulted in EPA's first national level SEPM training in three years. This training provided insight to the following areas:
 - Identify Best Practices from other agencies.
 - Understand the difference between EEO, Affirmative Employment and Diversity
 - Understand the roles within each functional area
 - Identify basic roles as SEPMs
 - Learn about OPM's Guidance for Diversity and Inclusion Strategic Plans
 - Ways to assist in the development of action plans and reports.

Strategic plans includes the collaboration with Regional EEOOs to develop a workgroup that will create a SEPM quarterly training curriculum that would be launched for all EPA SEPMs in FY 16.

- *National Leadership and Training Conferences.* The Agency supported the participation of employees to attend national training conferences such as the Out and Equal Conference, etc. Managers were encouraged to support their SEPMs' attendance as well.

- *Career Development to the Senior Executive Service (SES)* level was promoted by the Agency in collaboration with the Department of Treasury, its first SES Career Development Program in years. Applicants considered were at the GS 15 level. The selection process consisted of the following steps:
 - The program received 568 applications internal and external to the Agency which were reviewed for minimum qualifications.
 - (Note that applicant RNO data was not captured and this is an area for growth.)
 - Scoring of 367 application packages (ECQs and resumes) by panels to determine highly qualified.
 - Structured interviews were conducted of 53 highly qualified candidates.
 - Senior Executives conducted an evaluation of the 53 highly qualified candidates.
 - The Executive Resource Board panel identified 27 selectees to recommend to the Administrator.
 - Reference checks were also conducted.
 - The Administrator reviewed and approved 27 selectees; 23 were EPA employees, and four were from other agencies.

❖ Integration of EEO into the Agency's Strategic Mission

- The Administrator's focus on the EPA FY 2014-2018 Strategic Plan specifically identifies recruitment and retention of a diverse workforce as a fundamental requirement for accomplishing the Cross Agency Strategy: *Embracing EPA as a High-Performing Organization*.
- The Agency offered Voluntary Early Retirement Authority (VERA) and Voluntary Separation Incentive Payments (VSIP) to better align with the Agency's critical functions, and to address continuing resource constraints, and the unpredictability of attrition. In FY 14, 256 employees participated in EPA's Phase 1 VERA/VSIPs resulting in several realignments to program offices. Remaining nonparticipating offices were given a second opportunity in FY 15 where Phase 2 allows the process of realignment to their workforce.
- The Shared Service Centers assisted managers in all recruitment actions for FY 15. This presented a great opportunity to engage management and insert useful recruitment tools (e.g., the use of the Agency's recruitment source list and external stakeholders in accordance with the ODACMO Standard Operating Procedure) for all job announcements disseminated.
- In FY 15, ODACMO conducted activities that would further enhance EPA management tools. ODACMO created tools such as:
 - Internal guidance which identifies processes when working with White House Initiatives; and, external guidance which provides an overview of EPA programs including contracts, grants, cooperative agreements, MOUs, internships, advisory committees and panels.

- Recruiting Sources List (RSL), comprised of diverse organizations, and identifies EPA occupations. All EPA job vacancies are published on USAjobs.gov and sent to organizations on the RSL.
 - A centralized Agency outreach calendar for manager engagement combining resources; focus on career fairs; and other similar events that would allow for the recruitment of potential applicants.
 - Developed the MSI Tracking and Information System to allow the agency to meet reporting requirements in accordance with WHI requirements. (Note: This effort was to replace EPA outdated database systems to enhance efficient processes and effective reporting.)
- All EPA Regions and Headquarter Programs and Offices updated their respective supplemental plans and activities for MD-715, which incorporate EEO, Human Resource, and Diversity initiatives. In addition, these Action Plans promote the six essential elements of a model EEO Program.

❖ Management and Program Accountability

EPA policies, training, and leadership actions communicate a clear and consistent message that managers and employees share responsibility for creating a workplace free of barriers to EEO.

- The OCR along with the Deputy Civil Rights Officials (DCROs) implement the civil rights program consistent with agency policy and directives. DCROs participated in a minimum of two civil rights briefings related to employment or MD-715. Specifically, DCROs participate in mid and annual MD-715 Technical Assistance Visits.
- The Agency analyzed and developed a process to keep managers and employees informed when the criteria relevant for Schedule A, Persons with Disabilities (PWTD) conversion are met.
- As a result of increased briefings provided by NRAC, LORAC, and National Disability Program Managers, awareness on Schedule A PWTD and conversions increased. In FY 15, there were 21 PWD temporary employees eligible and qualified for conversion to permanent employee status. Additionally, there were 18 PWTD hires where eligibility and qualification for potential conversion can be considered over the next two fiscal years.
- A Fact Sheet was developed and added to the EPA manager tool kit on the use of Schedule A Hiring Authorities, term appointments with or without a not-to-exceed date, non-competitive conversion requirements, and other helpful tips.

Examples where best practices in the use of Schedule A Hiring Authorities are displayed throughout the Agency:

- When conducting review of interview panels and questions for every first round interview and assuring compliance with panel interview procedures for both internal and external Schedule A hires.
 - When conducting individual meetings with supervisors prior to the announcement of positions to determine if: 1) it is conducive to a person with a targeted disability; 2) outreach should be conducted; and 3) Schedule A hiring authority is appropriate.
 - When discussing recruitment options with supervisors approved for external hires, including Veteran hiring authorities, Schedule A, Peace Corps, Merit Promotion, Pathways and Delegated Examining.
 - When Schedule A hiring authorities are encouraged for external hires to include a database search for qualified students identified in the Workforce Recruitment Program (WRP) for College Students with Disabilities and forwarded to the selecting official for consideration.
- The OCR and ODACMO conducted, separately, technical assistance visits related to EEO, Diversity and Inclusion with twenty-three Headquarters and Regional program offices to provide guidance, data analytics and feedback based on the FY 15 multi-year action plans for both Workplace Inclusion and Management Directive 715.
 - Several Programs/Regions responded to the results of the Federal Employee Viewpoint Survey by establishing program office Employee Engagement Committees to inspire other employee engaging activities across the Agency.
 - The Diversity and Inclusion Advisory Committee (DIAC), under guidance from the ODACMO and as a subcommittee of the Human Resource Council, provided senior leadership oversight, counsel, and recommendations concerning the Agency's diversity and inclusion efforts. The DIAC met quarterly in FY 15 to expand involvement in promoting diversity and inclusion.
 - The ODACMO made accessible to all of EPA the *Management Guidance on Expanding Workplace Inclusion* which is a resource tool provided to managers intended to enhance practices that will strengthen the EPA as a high performing agency. The identified practices are comprised of relevant best practices reported from across the EPA, the federal government and the private sector.
 - The ODACMO developed an Inclusion Dashboard and engaged management on its use based on information gleaned from the Federal Employee Viewpoint Survey. The Dashboard is intended to measure employee perceptions of workplace inclusion. This allows the Agency to continue to provide transparency and access to information on diversity and inclusion to facilitate broad engagement.

❖ **Proactive Prevention of Unlawful Discrimination**

- The Agency processed 208 of the 223 requests for reasonable accommodations (or 93.3%) within the time frames identified in both the AFGE National Reasonable Accommodation Procedures (NRAP) and the EPA Reasonable Accommodation Procedures (RAP). The Agency has attained and exceeded the 90% processing rate for the fifth consecutive year in compliance with the requirements outlined in MD-715.

- *Procedures for Addressing Workplace Harassment - EPA Order 4711* (April 17, 2015). Extensive collaboration between OCR, OGC, and OARM to develop Anti-Harassment Procedures will result in the issuance by the Administrator of a revised Anti-Harassment Policy and Procedure in FY 16 (January, 2016). Although there have always been processes throughout the Agency for employees to raise allegations of workplace harassment, this national effort reflects an effort to establish a single written document that describes the national expectations for the contours of such a process.
- *Transgender and Gender Non-Confirming Policy Statement and Transgender and Gender Non-Confirming Employees Procedure – EPA Order 1000.31B*. Extensive collaboration between OCR, OGC, OARM and SEPMs occurred in FY 15 to develop the first Transgender and Gender Non-Confirming Policy and Procedure resulting in issuance by the Administrator in FY 16.
- *Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002 (No FEAR Act)*. OCR offered all current EPA employees biennial online No FEAR Act training in FY 14; as previously reported there was a 99.5% participation rate. Additionally, the EPA makes available the FY 14 No FEAR Act online training to all new employees to complete within their first 90 days as regulated. In this biennial period, 65% of the 586 new permanent EPA employees met the training requirement within their first 90 days; 31% did not complete the training by the end of FY 15. The Agency will explore opportunities where new employees can receive training as part of the Agency's orientation program and before their first 90 days. This training educates employees on their rights and responsibilities in a work environment free of discrimination and retaliation. Only permanent employees are required to take the training.
- The Agency continued to implement effective processes and procedures when requesting reasonable accommodations: 1) *National Reasonable Accommodation Procedures* for AFGE bargaining unit members and applicants for AFGE bargaining unit positions; and 2) EPA's *Reasonable Accommodation Procedures for Employees and Applicants with Disabilities*. All procedures are made available to all employees on the EPA's intranet site at: <http://intranet.epa.gov/civilrights/reasonableaccommodation.htm>. The National Reasonable Accommodation Coordinator (NRAC) regularly briefed the OCR Director and Local Organizations Reasonable Accommodation Coordinator (LORACs) on compliance with written procedures.

❖ Efficiency

- In FY 15, eleven new collateral duty EEO Counselors attended the 32 hour basic training and were added into the rotation to assist the efficiency within the EEO Complaints and Resolution Division (ECDRD).
- In FY 15, there were significant improvements with EEO informal complaint processing. Specific areas include timely fact-finding for all alleged complaints of discrimination within 30 days, making an offer to participate in alternative dispute resolution (ADR), and the number of ADR acceptances. When compared to FY 14, timeliness rates increased from 86% to 92%; ADR offer rates increased from 78% to 82%; and ADR

participation rates increased from 35% to 41%. The increase in ADR offers and acceptance rates contributed to the Agency's highest ADR resolution rate over the last seven years. In FY 15, 62% of the ADR cases were resolved.

- In FY 15, the timeliness rate reported for processing formal complaints was 31%. Work performed by EEO Specialists is monitored for technical accuracy and to ensure regulatory timeframes are met.
- OCR reduced the inventory of Final Agency Decisions (FAD) to meet the regulatory 60-day timeline by creating an internal FAD management plan which periodically re-assesses the inventory and updates the internal timeline for processing. OCR continues to strategically reduce the active docket through the use of contractors, interagency agreements and the inclusion of OCR staff attorneys. Although OCR staff decreased in FY 15 with respect to those assigned to complete FADs, OCR was still able to issue 12 FADs in FY 15, equal to the number of FADs issued in FY 14. In FY 15, Title VII monetary benefits paid out for resolved cases decreased by 77% from FY 14.
- The civil rights staff provide a monthly email newsletter to the EEO community, including collateral duty EEO Counselors, to keep them apprised of processing statistics, provide updates on important process changes or emerging issues, and to identify solutions to address common problems with work products.
- The OCR ECRD offered opportunities throughout the year for EEO Counselors to attend specialized refresher training geared toward yearly recertification. Courses offered this fiscal year included a three part series on the art of inquiry, updates/training from the EEOC on emerging issues related to religious accommodations and sex stereotyping, as well as reasonable accommodation and framing claims. Although not required, EEO Officers and Specialists participated in training when available. All Counselors received the required 8-hour refresher training.
- In addition, OCR maintained a Statement of Work with existing contractor after conducting an annual evaluation in the effective use of its current standard operating procedures (SOPs) which provide guidance on processing EEO cases at EPA, citing penalties when investigatory materials are late. To increase compliance with regulations, the SOP identifies case processing timelines, including allowing sufficient time for a legal sufficiency review to be conducted.
- Case Managers instituted the practice to maintain daily contact with and offer immediate feedback to assigned contracted investigators to improve timeliness of investigations.

❖ **Responsiveness and Legal Compliance**

- EEOC Workplace Harassment Training for EPA Managers (June 4, 2015). The Agency collaborated with the U.S. Equal Employment Opportunity Commission (EEOC) to pilot training for all EPA managers on the prevention of sexual harassment. The pilot was conducted with a few senior executives to review and evaluate the content of a four hour training module developed on workplace harassment. The Agency anticipates approximately 75 classes of this training module will be offered to all supervisors within

the first half of FY 16. In addition, EPA expects to complete development of an e-learning training module that will be launched for all employees within the second half of FY 16.

- There was a 61% decrease in the average number of days to issue a dismissal decision. In FY 14, the average was 258 days and in FY 15 the average decreased to 100 days.
- OCR monitored and conducted an analysis on the number of EPA formal complaints filed. When considering a three-year trend analysis, formal complaints filed jumped 14% by the end of FY 14; however, when compared to FY 15, rates for formal complaints filed dropped by 20%. This 6% difference, however, is more reflective of prior years when conducting a six-year trend analysis resulting in FY 15 being an anomaly. This could be attributed to FY 14 being the only year within that trend analysis to report a large separation of employees, including those employees participating in VERA/VSIP.

Workforce Analysis

Total Workforce:

At the close of FY 15, EPA employed 14,620 (93.92%) full/part time permanent and 946 (6.08%) temporary employees for a total of 15,566 employees. When compared to the close of FY 14, EPA employed 14,976 (94.2%) full/part time permanent and 929 (5.84%) temporary employees for a total of 15,905 employees. This was a net decrease of 356 (2.38%) full-time/part-time permanent employees and a net increase of 17 (1.83%) temporary employees for a total net decrease in FY 15 of 339 (2.13%) total employees when compared to FY 14.

Males comprised 49.09% (7,642) of the total workforce as compared to 51.86% of the national civilian labor force (NCLF) in FY 15. Females comprised 50.91% (7,924) of the total workforce as compared to 48.14% of the NCLF. In FY 14, the total workforce of males comprised 48.02 % (7,629) of the workforce, where females comprised 51.98% (8,259) of the workforce. This was a net increase for males at 13 (1.07%) and a net decrease of 335 (1.07%) for females when compared to FY 14.

Representation of Class Groups

In FY 15 the workforce profile according to Table A1 for permanent full/part time employees is as follows:

- White men comprised 36.39% (5,320) of the workforce compared to 38.33% of the CLF.
- White women comprised 30.51% (4,461) of the workforce compared to 34.03% of the CLF.
- Black men comprised 4.79% (700) of the workforce compared to 5.49% of the CLF.
- Black women comprised 13.07% (1,911) of the workforce compared to 6.53% of the CLF.
- Hispanic men comprised 3.02% (441) of the workforce compared to 5.17% of the CLF.
- Hispanic women comprised 3.63% (531) of the workforce compared to 4.79% of the CLF.

- Asian men comprised 3.07% (442) of the workforce compared to 1.97% of the CLF.
- Asian women comprised 3.30 % (482) of the workforce compared to 1.93% of the CLF.
- Native Hawaiian men comprised 0.05% (7) of the workforce compared to 0.07% of the CLF.
- Native Hawaiian women comprised 0.07 % (10) of the workforce compared to 0.07% of the CLF.
- American Indian men comprised 0.27% (39) of the workforce compared to 0.55% of the CLF.
- American Indian women comprised 0.40% (59) of the workforce compared to 0.53% of the CLF.
- Two or More Races men comprised 0.65% (95) of the workforce compared to 0.26% of the CLF.
- Two or More Races women comprised 0.79% (115) of the workforce compared to 0.28% of the CLF.

At the end of FY 15, the total number of individuals with targeted disabilities in the EPA workforce declined from 378 (2.38%) in FY 2014 to 364 (2.34%) in FY 15, resulting in a net decrease of 14.

EPA data on temporary employees, located in Tables A1 and B1, indicate the profile of persons with disabilities and targeted disabilities (PWTD).

- Full/Part Time Permanent PWTD: There were a total of 364 (2.34%) PWTD during FY 15 compared to 378 (2.38%) PWTD during FY 14, a decrease of 14 PWTD.
- Temporary PWTD: There were 5 (0.53%) PWTD during FY 15, compared to 6 (0.65%) PWTD during FY 14, a decrease of 1 PWTD.

The federal-wide goal remains at 2.0% which EPA has again exceeded.

Summary

EPA made significant progress in the areas of recruitment, hiring, promotion, retention, and succession planning. ODACMO collaborated with the OHR to create a centralized tool, recruitment sourcing lists (RSL), which coordinates Agency recruitment activities. The RSL, managed through the Shared Service Centers, centralizes the effort to broadly reach schools, universities, organizations and associations for all permanent (full/part time) job announcements. This effort may have improved triggers identified in FY 14. The OCR and OHR will work with hiring officials to further analyze efforts to address triggers.

In FY 15, the Agency, along with the Department of Treasury (DOT), implemented through the Treasury Executive Institute's SES Candidate Development Program (CDP) an EPA CDP. The position was advertised outside through USAJobs resulting in 27 highly qualified candidates being selected; 23 (74%) were EPA employees. Selectees from the Regions represented 30% while selectees from Headquarters represented 55%; additionally, there was a small percentage of non-EPA selectees representing 15%.

Over the last two fiscal years, EPA operated under a series of temporary, agency-wide hiring policies, such as hiring only one person for every two or three who left. Reduced resources and hiring constraints were challenging to the Agency's ability to attract new talent, grow diversity from within, and provide the necessary tools to do the job of protecting human health and the environment.

The Agency offered employees voluntary early outs and buyouts (VERA/VSIP) to better align with the Agency's critical functions, and to address continuing resource constraints, and the unpredictability of attrition.

The Agency committed to realigning its workforce to meet the changing mission requirements, to modify and update business processes, and to increase support for employee performance through training, recognition, technology, and similar areas. Therefore, in FY 15, 256 employees participated in EPA's Phase 1 VERA/VSIPs, resulting in several realignments to program offices. Offices not ready to begin the process of realigning their workforce were offered an opportunity to participate in the Phase 2 project later in FY 15. The VERA/VSIPs could have a temporary impact on the Agency's workforce and with its coinciding effort to hire to capacity. However, the Agency's strategic outlook is that by offering VERA/VSIPs, EPA set forth a process that will ensure flexibility and skills to design and build a high performing organization for the future.

Although participation rates for PWTD increased from 201 (1.18%) to 378 (2.38%) at the end of FY 14, the participation rates decreased in FY 15 from 378 (2.38%) to 364 (2.34%). This decline of 14 PWTD was a rate change of 3.70%. However, the percentage of PWTD has, for the second year, surpassed the Administration's federal goal of 2%. The Agency continues to conduct training, outreach and recruitment to further surpass this goal. However, in FY 15, the EPA hired 13 individuals with disabilities under the use of Schedule A Hiring Authority as compared to FY 14 when 18 people with disabilities were hired with eligibility for conversion in FY 16. Additionally, the Agency converted 21 EPA employees with disabilities from term appointments to permanent status in FY 15.

Considering the impacts of VERA/VSIP, the EPA OHR will continue to discuss realistic goals for each region and program office, including Agency goals for the hiring of individuals with targeted disabilities, consistent with Executive Order 13548 to ensure a diverse and inclusive workforce.

Where the total number of full/part time temporary and permanent employees with qualified individuals with a reportable disability increased by 0.73% reported in FY 14, there was a slight decrease from 2.38% in FY 14 to 2.34% in FY 15, a difference of 0.04%.

The Agency has attained a 90% processing rate for the fifth consecutive year in compliance with the requirements outlined in MD-715 for Reasonable Accommodations (RA). The following is a summary and analysis of these requests:

- 204 of the 223 RA requests (or 91.5%) were processed and concluded in FY 15;
- 144 of the 223 (or 64.6%) were approved;
- 17 of the 223 (or 7.6%) were denied;

- 32 of the 223 (or 14.3%) were withdrawn by the employee;
- 6 of the 223 (or 2.7%) were denied under reasonable accommodation but with some relief offered outside of the reasonable accommodation process;
- 1 of the 223 (or .4%) was terminated;
- 2 of the 223 (or .9%) retired;
- 1 of the 223 (or .4%) closed (no response from employee);
- 1 of the 223 (or .4%) passed away;
- 17 of the 223 (or 7.6%) remain in pending status;
- 2 of the 223 (or .9%) are in a delayed status.

The Agency processed 208 of the 223 requests (or 93.3%) within the time frames identified in both the AFGF National Reasonable Accommodation Procedures (NRAP) and the EPA Reasonable Accommodation Procedures. In addition, there were fewer requests for reasonable accommodations processed in FY 15 with a total of 223.

EPA will continue its multiyear plan which includes updates to the exit interview form and process and to track the motivation for employees' departure from Agency employment. By furthering its understanding of employees' reasons for leaving the Agency, EPA aims to improve its ability to retain talented staff.

While EPA made noteworthy progress in FY 15, there are numerous opportunities for growth. In particular, most of the planned activities in Part I have been carried over to FY 16. EPA has identified the use of hiring panels and career development opportunities to decrease triggers associated with the new hire qualification and selection rates; and the internal competitive promotions and senior grades data generally.

During FY 15, EPA planned a number of continued activities aimed to improve our understanding of triggers and establish a model EEO program, including the development of three main goals:

- A hiring survey to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified. Although the recommendation was developed and a survey drafted, senior leaders decided that the Agency should explore other means of examining the hiring process over the next year.
- A process to collect, retain, and analyze applicant flow data for Series 0905 Attorney positions. OCR will begin coordination with lead program office of Series 0905 Attorney positions to establish this process.
- Processes to enhance recruitment: a) a tool to evaluate the effectiveness of the strategic recruitment plan and guidance document; b) a tool to assess the effectiveness of career development activities; c) a process for collecting internal SES applicant flow data in accordance with the requirements of MD-715.

Additionally, EPA continued activities that promote education and ensure awareness of Schedule A Hiring Authorities for PWTD; use of tool kits such as Fact Sheets; and communication with managers on potential conversions to competitive positions, when appropriate.

The Agency continues to analyze efforts in the above national goals, including planned actions in FY 16 to address gaps such as:

- Develop/implement process to collect, retain, and analyze applicant flow data for Attorney Advisor, GS-0905, and SES positions.
- Develop/implement a an alternative to the management hiring satisfaction survey to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified.
- Develop/implement tool to evaluate the effectiveness of the strategic recruitment plan and guidance document.
- Further develop/implement trainings that includes information about competitive conversions and track the appointment expiration dates of PWTDS.
- Develop/implement updated exit interview process and forms to track motivation for employees' departure.
- Develop/implement process to collect, retain, and analyze employee participation in career development opportunities, including trainings, details, and e-learning.
- Update position descriptions to accurately reflect the job duties of major occupations where lower than anticipated application, qualification, and selection rates are identified.

Further develop and effectively disseminate information related to Relevant Civilian Labor Force data to assist HQ and Regional Program Offices in more accurately conducting targeted recruitment and outreach efforts.

EEOC FORM 715-01 PART F	<i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
U.S. Environmental Protection Agency	For period covering October 1, 2014 to September 30, 2015

CERTIFICATION of ESTABLISHMENT of CONTINUING EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS

I, Velveta Golightly-Howell, Director of Civil Rights, am the Principal EEO Director/Official for the US Environmental Protection Agency.

EPA has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.

EPA has also analyzed its workforce profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

Signature of Principal EEO Director/Official
Certifies that this Federal Agency Annual EEO Program
Status Report is in compliance with EEO MD-715

Date

Signature of Agency Head or Agency Head Designee

Date

Part G: Agency Self-Assessment**Essential Element A: Demonstrated Commitment From Agency Leadership**

Requires EPA head to issue written policy statements ensuring a workplace free of discriminatory harassment and a commitment to equal employment opportunity.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's Status Report
	Yes	No	
Compliance Indicator: EEO policy statements are up-to-date.			
1. EPA Head was installed on June 18, 2013. The Administrator issued the EEO policy statement January 2014. Was the EEO Policy Statement issued within 6 - 9 months of the installation of EPA Head? If no, provide an explanation.	X		Administrator reaffirmed FY 15 EEO and Anti-Harassment policy statements, December 2014.
2. During the current Agency Head's tenure, has the EEO Policy Statement been reissued annually? If no, provide an explanation.	X		
3. Are new employees provided a copy of the EEO Policy Statement during orientation?	X		Please see Part H-4.
4. When an employee is promoted into the supervisory ranks, is s/he provided a copy of the EEO Policy Statement?	X		
5. Have the heads of subordinate reporting components communicated support of all Agency EEO policies through the ranks?	X		
6. Has EPA made written materials available to all employees and applicants, informing them of the variety of EEO programs and administrative and judicial remedial procedures available to them?	X		
7. Has EPA prominently posted such written materials in all personnel offices, EEO offices, and on EPA's internal website? [see 29 CFR §1614.102(b)(5)]	X		
Compliance Indicator: Agency EEO policy is vigorously enforced by Agency management.			
8. Are managers and supervisors evaluated on their commitment to Agency EEO policies and principles, including their efforts to:	X		
9. Resolve problems/disagreements and other conflicts in their respective work environments as they arise?	X		

10. Address concerns, whether perceived or real, raised by employees and following-up with appropriate action to correct or eliminate tension in the workplace?	X		
11. Support EPA's EEO Program through allocation of mission personnel to participate in community outreach and recruitment programs with private employers, public schools and universities?	X		
12. Ensure full cooperation of employees under his/her supervision with EEO office officials such as EEO Counselors, EEO Investigators, etc.?	X		
13. Ensure a workplace that is free from all forms of discrimination, harassment and retaliation?	X		
14. Ensure that subordinate supervisors have effective managerial, communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications?	X		
15. Ensure the provision of requested religious accommodations when such accommodations do not cause an undue hardship?	X		
16. Ensure the provision of requested disability accommodations to qualified individuals with disabilities when such accommodations do not cause an undue hardship?	X		
17. Have all employees been informed about what behaviors are inappropriate in the workplace and that this behavior may result in disciplinary actions?	X		
18. Describe what means were utilized by EPA to so inform its workforce about the penalties for unacceptable behavior.	X		
19. Have the procedures for reasonable accommodation for individuals with disabilities been made readily available/accessible to all employees by disseminating such procedures during orientation of new employees and by making such procedures available on the World Wide Web or Internet?	X		
20. Have managers and supervisor been trained on their responsibilities under the procedures for reasonable accommodation?	X		

Essential Element B: Integration of EEO into EPA's Strategic Mission

Requires that EPA's EEO programs be organized and structured to maintain a workplace that is free from discrimination in any of EPA's policies, procedures or practices and supports EPA's strategic mission.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's status report.
	Yes	No	
Compliance Indicator: The reporting structure for the EEO Program provides the Principal EEO Official with appropriate authority and resources to effectively carry out a successful EEO Program.			
21. Is the EEO Director under the direct supervision of EPA head? [see 29 CFR §1614.102(b)(4)] For subordinate level reporting components, is the EEO Director/Officer under the immediate supervision of the lower level component's head official? (For example, does the Regional EEO Officer report to the Regional Administrator?)	X		
22. Are the duties and responsibilities of EEO officials clearly defined?	X		
23. Do the EEO officials have the knowledge, skills, and abilities to carry out the duties and responsibilities of their positions?	X		
24. If EPA has 2 nd level reporting components, are there organizational charts that clearly define the reporting structure for EEO programs?	N/A		
25. If EPA has 2 nd level reporting components, does EPA-wide EEO Director have authority for the EEO programs within the subordinate reporting components?	N/A		
If not, please describe how EEO program authority is delegated to subordinate reporting components.			

Compliance Indicator: The EEO Director and other EEO professional staff responsible for EEO programs have regular and effective means of informing EPA head and senior management officials of the status of EEO programs and are involved in, and consulted on, management/personnel actions.			
26. Does the EEO Director/Officer have a regular and effective means of informing EPA head and other top management officials of the effectiveness, efficiency and legal compliance of EPA's EEO program?	X		
27. Following the submission of the immediately preceding FORM 715-01, did the EEO Director/Officer present to the head of EPA and other senior officials the "State of EPA" briefing covering all components of the EEO report, including an assessment of the performance of EPA in each of the six elements of the Model EEO Program and a report on the progress of EPA in completing its barrier analysis including any barriers it identified and/or eliminated or reduced the impact of?	X		
28. Are EEO (Regional) program officials present during agency deliberations prior to decisions regarding recruitment strategies, vacancy projections, succession planning, selections for training/career development opportunities, and other workforce changes?	X		
29. Does EPA consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions such as re-organizations and re-alignments?	X		
30. Are management/personnel policies, procedures and practices examined at regular intervals to assess whether there are hidden impediments to the realization of equality of opportunity for any group(s) of employees or applicants? [see 29 C.F.R. § 1614.102(b)(3)]	X		

31. Is the EEO Director included in EPA's strategic planning, especially EPA's human capital plan, regarding succession planning, training, etc., to ensure that EEO concerns are integrated into EPA's strategic mission?	X		
Compliance Indicator: EPA has committed sufficient human resources and budget allocations to its EEO programs to ensure successful operation.			
32. Does the EEO Director have the authority and funding to ensure implementation of agency EEO Action Plans to improve EEO program efficiency and/or eliminate identified barriers to the realization of equality of opportunity?	X		
33. Are sufficient personnel resources allocated to the EEO Program to ensure that agency self-assessments and self-analyses prescribed by EEO MD-715 are conducted annually and to maintain an effective complaint processing system?	X		
34. Are statutory/regulatory EEO related Special Emphasis Programs sufficiently staffed?	X		
35. Federal Women's Program - 5 U.S.C. 7201; 38 U.S.C. 4214; Title 5 CFR, Subpart B, 720.204	X		
36. Hispanic Employment Program - Title 5 CFR, Subpart B, 720.204	X		
37. People With Disabilities Program Manager; Selective Placement Program for Individuals With Disabilities - Section 501 of the Rehabilitation Act; Title 5 U.S.C. Subpart B, Chapter 31, Subchapter I-3102; 5 CFR 213.3102(t) and (u); 5 CFR 315.709	X		
38. Are other agency special emphasis programs monitored by the EEO Office for coordination and compliance with EEO guidelines and principles, such as FEORP - 5 CFR 720; Veterans Employment Programs; and Black/African American; American Indian/Alaska Native, Asian American/Pacific Islander programs?	X		
Compliance Indicator: EPA has committed sufficient budget to support the success of its EEO Programs.			

39. Are there sufficient resources to enable EPA to conduct a thorough barrier analysis of its workforce, including the provision of adequate data collection and tracking systems?	X		
40. Is there sufficient budget allocated to all employees to utilize, when desired, all EEO programs, including the complaint processing program and ADR, and to make a request for reasonable accommodation? (Including subordinate level reporting components?)	X		
41. Has funding been secured for publication and distribution of EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures, etc.)?	X		
42. Is there a central fund or other mechanism for funding supplies, equipment and services necessary to provide disability accommodations?	X		
43. Does EPA fund major renovation projects to ensure timely compliance with Uniform Federal Accessibility Standards?	X		
44. Is the EEO Program allocated sufficient resources to train all employees on EEO Programs, including administrative and judicial remedial procedures available to employees?	X		
45. Is there sufficient funding to ensure the prominent posting of written materials in all personnel and EEO offices? [see 29 C.F.R. § 1614.102(b)(5)]	X		
46. Is there sufficient funding to ensure that all employees have access to this training and information?	X		
47. Is there sufficient funding: to provide all managers and supervisors with training and periodic up-dates on their EEO responsibilities?	X		
48. for ensuring a workplace that is free from all forms of discrimination, including harassment and retaliation?	X		

49. to provide religious accommodations?	X		
50. to provide disability accommodations in accordance with EPA's written procedures?	X		
51. in the EEO discrimination complaint process?	X		
52. to participate in ADR?	X		

Essential Element C: Management and Program Accountability

This element requires EPA Head to hold all managers, supervisors, and EEO Officials responsible for the effective implementation of EPA's EEO Program and Plan.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's status report
	Yes	No	
Compliance Indicator: EEO program officials advise and provide appropriate assistance to managers/supervisors about the status of EEO programs within each manager or supervisor's area or responsibility.			
53. Are regular (monthly/quarterly/semi-annually) EEO updates provided to management/supervisory officials by EEO program officials?	X		
54. Do EEO program officials coordinate the development and implementation of EEO Plans with all appropriate agency managers to include Agency Counsel, Human Resource Officials, Finance, and the Chief information Officer?	X		
Compliance Indicator: The Human Resources Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures are in conformity with instructions contained in EEOC management directives. [see 29 CFR § 1614.102(b)(3)]			
55. Have time-tables or schedules been established for EPA to review its Merit Promotion Program Policy and Procedures for systemic barriers that may be impeding full participation in promotion opportunities by all groups?	X		
56. Have time-tables or schedules been established for EPA to review its Employee Recognition Awards Program and Procedures for systemic barriers that may be impeding full participation in the program by all groups?	X		
57. Have time-tables or schedules been established for EPA to review its Employee Development/Training Programs for systemic barriers that may be impeding full participation in training opportunities by all groups?	X		

Compliance Indicator: When findings of discrimination are made, EPA explores whether or not disciplinary actions should be taken.			
58. Does EPA have a disciplinary policy and/or a table of penalties that covers employees found to have committed discrimination?	X		
59. Have all employees, supervisors, and managers been informed as to the penalties for being found to perpetrate discriminatory behavior or for taking personnel actions based upon a prohibited basis?	X		
60. Has EPA, when appropriate, disciplined or sanctioned managers/supervisors or employees found to have discriminated over the past two years?	X		
<p>If so, cite number found to have discriminated and list penalty/disciplinary action for each type of violation.</p> <p>Response: There was one finding of discrimination during this time period, and as of the date of this report, management is considering appropriate disciplinary action in accordance with EPA's Table of Penalties; however, no final decision have yet been made.</p>			
61. Does EPA promptly (within the established time frame) comply with EEOC, Merit Systems Protection Board, Federal Labor Relations Authority, labor arbitrators, and District Court orders?	X		
62. Does EPA review disability accommodation decisions/actions to ensure compliance with its written procedures and analyze the information tracked for trends, problems, etc.?	X		

Essential Element D: Proactive Prevention

Requires that EPA head makes early efforts to prevent discriminatory actions and eliminate barriers to equal employment opportunity in the workplace.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's status report
	Yes	No	
Compliance Indicator: Analyses to identify and remove unnecessary barriers to employment are conducted throughout the year.			
63. Do senior managers meet with and assist the EEO Director and/or other EEO Program Officials in the identification of barriers that may be impeding the realization of equal employment opportunity?	X		
64. When barriers are identified, do senior managers develop and implement, with the assistance of EPA EEO office, agency EEO Action Plans to eliminate said barriers?	X		
65. Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans?	X		
66. Are trend analyses of workforce profiles conducted by race, national origin, sex and disability?	X		
67. Are trend analyses of the workforce's major occupations conducted by race, national origin, sex and disability?	X		
68. Are trends analyses of the workforce's grade level distribution conducted by race, national origin, sex and disability?	X		
69. Are trend analyses of the workforce's compensation and reward system conducted by race, national origin, sex and disability?	X		

70. Are trend analyses of the effects of management/personnel policies, procedures and practices conducted by race, national origin, sex and disability?	X		
Compliance Indicator: The use of Alternative Dispute Resolution (ADR) is encouraged by senior management.			
71. Are all employees encouraged to use ADR?	X		
72. Is the participation of supervisors and managers in the ADR process required?	X		

Essential Element E: Efficiency

Requires that EPA head ensure that there are effective systems in place for evaluating the impact and effectiveness of EPA's EEO Programs as well as an efficient and fair dispute resolution process.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's status report
	Yes	No	
Compliance Indicator: EPA has sufficient staffing, funding, and authority to achieve the elimination of identified barriers.			
73. Does the EEO Office employ personnel with adequate training and experience to conduct the analyses required by MD-715 and these instructions?	X		Please see explanation listed under Part H-1.
74. Has EPA implemented an adequate data collection and analysis systems that permit tracking of the information required by MD-715 and these instructions?	X		
75. Have sufficient resources been provided to conduct effective audits of field facilities' efforts to achieve a model EEO program and eliminate discrimination under Title VII and the Rehabilitation Act?	X		
76. Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations in all major components of EPA?	X		
77. Are 90% of accommodation requests processed within the time frame set forth in EPA procedures for reasonable accommodation?	X		
Compliance Indicator: EPA has an effective complaint tracking and monitoring system in place to increase the effectiveness of EPA's EEO Programs.			

78. Does EPA use a complaint tracking and monitoring system that allows identification of the location and status of complaints and length of time elapsed at each stage of EPA's complaint resolution process?	X		
79. Does EPA's tracking system identify the issues and bases of the complaints, the aggrieved individuals/complainants, the involved management officials and other information to analyze complaint activity and trends?	X		
80. Does EPA hold contractors accountable for delay in counseling and investigation processing times?	X		
If yes, briefly describe how: In the event of a delay, contract payment is reduced or the contract is not renewed.			
81. Does EPA monitor and ensure that new investigators, counselors, including contract and collateral duty investigators, receive the 32 hours of training required in accordance with EEO Management Directive MD-110?	X		
82. Does EPA monitor and ensure that experienced counselors, investigators, including contract and collateral duty investigators, receive the 8 hours of refresher training required on an annual basis in accordance with EEO Management Directive MD-110?	X		
Compliance Indicator: EPA has sufficient staffing, funding and authority to comply with the time frames in accordance with the EEOC (29 C.F.R. Part 1614) regulations for processing EEO complaints of employment discrimination.			
83. Are benchmarks in place that compares EPA's discrimination complaint processes with 29 C.F.R. Part 1614?	X		
84. Does EPA provide timely EEO counseling within 30 days of the initial request or within an agreed upon extension in writing, up to 60 days?	X		

85. Does EPA provide an aggrieved person with written notification of his/her rights and responsibilities in the EEO process in a timely fashion?	X		
86. Does EPA complete the investigations within the applicable prescribed time frame?	X		
87. When a complainant requests a final agency decision, does EPA issue the decision within 60 days of the request?		X	Please see explanation listed under Part H-2.
88. When a complainant requests a hearing, does EPA immediately upon receipt of the request from the EEOC AJ forward the investigative file to the EEOC Hearing Office?	X		
89. When a settlement agreement is entered into, does EPA timely complete any obligations provided for in such agreements?	X		
90. Does EPA ensure timely compliance with EEOC AJ decisions which are not the subject of an appeal by EPA?	X		
Compliance Indicator: There is an efficient and fair dispute resolution process and effective systems for evaluating the impact and effectiveness of EPA's EEO complaint processing program.			
91. In accordance with 29 C.F.R. §1614.102(b), has EPA established an ADR Program during the pre-complaint and formal complaint stages of the EEO process?	X		
92. Does EPA require all managers and supervisors to receive ADR training in accordance with EEOC (29 C.F.R. Part 1614) regulations, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR?	X		
93. After EPA has offered ADR and the complainant has elected to participate in ADR, are the managers required to participate?	X		

94. Does the responsible management official directly involved in the dispute have settlement authority?	X		
Compliance Indicator: EPA has effective systems in place for maintaining and evaluating the impact and effectiveness of its EEO programs.			
95. Does EPA have a system of management controls in place to ensure the timely, accurate, complete and consistent reporting of EEO complaint data to the EEOC?	X		
96. Does EPA provide reasonable resources for the EEO complaint process to ensure efficient and successful operation in accordance with 29 C.F.R. § 1614.102(a)(1)?	X		
97. Does EPA EEO office have management controls in place to monitor and ensure that the data received from Human Resources is accurate, timely received, and contains all the required data elements for submitting annual reports to the EEOC?	X		
98. Do EPA's EEO programs address all of the laws enforced by the EEOC?	X		
99. Does EPA identify and monitor significant trends in complaint processing to determine whether EPA is meeting its obligations under Title VII and the Rehabilitation Act?	X		
100. Does EPA track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD-715 standards?		X	Please see Part H-3.
101. Does EPA consult with other agencies of similar size on the effectiveness of their EEO programs to identify best practices and share ideas?	X		
Compliance Indicator: EPA ensures that the investigation and adjudication function of its complaint resolution process are separate from its legal defense arm of agency or other offices with conflicting or competing interests.			

102. Are legal sufficiency reviews of EEO matters handled by a functional unit that is separate and apart from the unit which handles agency representation in EEO complaints?	X		
103. Does EPA discrimination complaint process ensure a neutral adjudication function?	X		
104. If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints?	X		

Essential Element F: Responsiveness and Legal Compliance

This element requires that federal agencies are in full compliance with EEO statutes and EEOC regulations, policy guidance, and other written instructions.

EEOC MD 715 Agency Assessment Questions	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to EPA's status report
	Yes	No	
Compliance Indicator: Agency personnel are accountable for timely compliance with orders issued by EEOC Administrative Judges.			
105. Does EPA have a system of management control to ensure that agency officials timely comply with any orders or directives issued by EEOC Administrative Judges?	X		
Compliance Indicator: EPA's system of management controls ensures that EPA timely completes all ordered corrective action and submits its compliance report to EEOC within 30 days of such completion.			
106. Does EPA have control over the payroll processing function of EPA? If Yes, answer the two questions below.	X		
107. Are there steps in place to guarantee responsive, timely, and predictable processing of ordered monetary relief?	X		
108. Are procedures in place to promptly process other forms of ordered relief?	X		
Compliance Indicator: Agency personnel are accountable for the timely completion of actions required to comply with orders of EEOC.			
109. Is compliance with EEOC orders encompassed in the performance standards of any agency employees?	X		
If so, please identify the employees by title in the comments section, and state how performance is measured. Compliance is specifically included in performance standards of the Assistant Director of the Employment Complaints Resolutions Division.			

110. Is the unit charged with the responsibility for compliance with EEOC orders located in the EEO office?	X		
If not, please identify the unit in which it is located, the number of employees in the unit, and their grade levels in the comments section. N/A			
111. Have the involved employees received any formal training in EEO compliance?	X		
Does EPA promptly provide to the EEOC the following documentation for completing compliance:			
112. Attorney Fees: Copy of check issued for attorney fees and /or a narrative statement by an appropriate agency official, or agency payment order dating the dollar amount of attorney fees paid?	X		
113. Awards: A narrative statement by an appropriate agency official stating the dollar amount and the criteria used to calculate the award?	X		
114. Back Pay and Interest: Computer print-outs or payroll documents outlining gross back pay and interest, copy of any checks issued, narrative statement by an appropriate agency official of total monies paid?	X		
115. Compensatory Damages: The final agency decision and evidence of payment, if made?	X		
116. Training: Attendance roster at training session(s) or a narrative statement by an appropriate agency official confirming that specific persons or groups of persons attended training on a date certain?	X		
117. Personnel Actions (e.g., Reinstatement, Promotion, Hiring, Reassignment): Copies of SF-50s	X		
118. Posting of Notice of Violation: Original signed and dated notice reflecting the dates that the notice was posted. A copy of the notice will suffice if the original is not available.	X		

119. Supplemental Investigation: 1. Copy of letter to complainant acknowledging receipt from EEOC of remanded case. 2. Copy of letter to complainant transmitting the Report of Investigation (not the ROI itself unless specified). 3. Copy of request for a hearing (complainant's request or agency's transmittal letter).	X		
120. Final Agency Decision (FAD): FAD or copy of the complainant's request for a hearing.	X		
121. Restoration of Leave: Print-out or statement identifying the amount of leave restored, if applicable. If not, an explanation or statement.	X		
122. Civil Actions: A complete copy of the civil action complaint demonstrating same issues raised as in compliance matter.	X		
123. Settlement Agreements: Signed and dated agreement with specific dollar amounts, if applicable. Also, appropriate documentation of relief is provided.	X		

Part H Plan to Correct Deficiencies

Part H-1: EEO Staff and MD 715

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	(Part G: Q-73) Does the EEO Office employ personnel with adequate training and experience to conduct the analyses required by MD 715 and these instructions? Yes.
OBJECTIVE:	To further improve the training and skills of EEO personnel in the Office of Civil Rights and in the Regions to enable them to administer all aspects of the EEO process.
RESPONSIBLE OFFICIAL:	Director, Office of Civil Rights
DATE OBJECTIVE INITIATED:	September 1, 2010
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2015
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
1. MD-715 Barrier Analysis Training provided to Affirmative Employment, Analysis and Accountability staff by the U.S. EEOC.	Completed May 2015
2. Provide Affirmative Employment, Analysis and Accountability staff with continuous on-the-job application of methods used to conduct MD-715 Barrier Analysis.	September 2015

REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:

In FY 15, the Office of Civil Rights (OCR) continued to prioritize training and improved the capacity of Affirmative Employment, Analysis and Accountability (AEAA) staff to meet requirements of analysis of triggers and any potential barriers under MD-715.

1. Since the FY 14 appointment of the Assistant Director, the AEAA staff have fully engaged in all processes of MD-715, to include opportunities such as:
 - Participation in Basic and Advanced Datamart web-based Query and Analysis training that was facilitated by Department of Interior/Interior Business Center (DOI/IBC)
 - Participation in MD-715 Barrier Analysis Training that was facilitated by the EEOC Training Institute.
 - On-the-job application of the above methods and techniques when conducting analysis, identifying triggers and potential barriers, developing useful graphs/tables to reflect EPA workforce data, etc.
 - Drafting sections to the MD-715 report where summary and analysis is required.

As a result, staff have been adequately trained to conduct each process of MD-715. *Staff participating on details outside of the OCR office will receive training in the following fiscal year.

2. In previous years, the AEAA staff was provided on the job training from a staff-level employee on detail from the Office of General Counsel. However, with the additional training provided and knowledge of the MD715 processes in FY 15, AEAA staff were able to complete workforce charts, conduct program specific analyses, and create briefings that would lead the process in conducting 23 Technical Assistance Visits to its program offices. This process further OCR partners like ODACMO in streamlining efforts related to complete, implement and monitor processes, planned activities, and reporting. The collaboration between OARM and OCR continue to enhance areas related to MD-715, Diversity and Inclusion. AEAA staff work collaboratively on affirmative employment efforts across EPA.

In addition, OCR had the opportunity to provide two details into the AEAA program from the Regions to further enhance the methods of completing, implementing and monitoring through shared best practices. Opportunities for engagement included the use of personnel data systems such as Datamart, analysis of MD-715 tables, and creating action plans for their FY program level report and annual EPA MD-715 report. The AEAA staff continue to complete, implement and monitor planned MD-715 activities.

Part H-2: Timeliness and Effectiveness of EEO Complaints Processing Program

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	(Part G: Q-87) When a complainant requests a Final Agency Decision, does EPA issue the decision within 60 days of the request? No.
OBJECTIVE:	<p>To ensure that EEO investigations and Final Agency Decisions are consistently completed within the timeframes prescribed by EEOC MD 110 and 29 C.F.R. Part 1614.</p> <p>To ensure that legal counsel is given adequate time to conduct sufficiency reviews while still meeting regulatory timeframes.</p>
RESPONSIBLE OFFICIAL:	Director, Office of Civil Rights Assistant Director, Office of Civil Rights, Employment Complaints Resolutions Division
DATE OBJECTIVE INITIATED:	March 1, 2011
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2016
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
1. Staffing for an Attorney-Adviser for the Office of Civil Rights' Employment Complaints Resolutions Division (ECDR) Headquarters office will be a priority to ensure timely processing of Final Agency Decisions.	Completed September 2015
2. Staffing of the OCR Attorney-Adviser in FY 15 ensures priority for eliminating a minimum of 60% of the FAD docket within the required time frames by FY 17.	September 2016
3. ECDR will continue to utilize the newly created FAD Management Plan to assess the docket.	September 2017

4. ECRD will utilize its Inter-Agency Agreements and Contractors to strategically reduce its active docket on a continual basis.

September 2017

REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:

1. OCR hired another Attorney-Advisor in the fourth quarter of FY 15. With this addition bringing the total number of Attorney-Advisors who are part of the complaint resolution staff to two, it is anticipated our ability to more consistently decrease the pending FAD docket.
2. OCR continued to reduce the Final Agency Decision (FAD) docket and to meet the 60-day timeline requirements.
3. Additionally, OCR created an internal FAD management plan which periodically re-assesses the docket and updates the internal timeline to process and issue a FAD. OCR has made progress in reducing both the number and age of FADs in its docket.
4. OCR lost one of its attorneys who primarily wrote FADs at the beginning of FY 15. This loss was significant and resulted in a FAD docket that exceeded the capacity of a single attorney to efficiently manage in addition with managing other work associated with complaint processing. Yet despite these circumstance, OCR still issued more than a dozen FADs in FY 15.

Part H-3: Tracking and Analysis of Recruitment Efforts

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	(Part G: Q-100) Does EPA track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD 715 standards? No.	
OBJECTIVE:	To create a mechanism for proactive information and communications exchanged among EPA's national recruitment program staff, selecting officials, organizational program management/regional human resources staff, and leadership in the Human Resources Shared Service Centers to shape recruitment efforts in their early stages and help reduce barriers. The desired goal is to focus recruitment efforts that will enhance diversity in the applicant pools.	
RESPONSIBLE OFFICIAL:	Acting Assistant Administrator, Office of Administration & Resources Management Director, Office of Civil Rights Director, Office of Human Resources Deputy Civil Rights Officials	
DATE OBJECTIVE INITIATED:	November 1, 2013	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	March 30, 2018	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:		TARGET DATE (Must be specific)
1. The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to develop a management hiring satisfaction survey to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified.		Amended September 2016

The Office of Civil Rights will identify an alternative method(s) or tool(s) which allow the Agency to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified.	
2. The Office of Civil Rights, in collaboration with the Shared Services Centers, will update OCR position descriptions to accurately reflect the job duties of major occupations where lower than anticipated application, qualification, and selection rates are identified.	September 2016
3. The Office of Civil Rights will collaborate with the Office of Human Resources to evaluate the data from the Management Hiring Satisfaction Survey to determine whether there are any procedural barriers associated with the development of vacancy announcements and outreach efforts.	September 2017
4. The Office of Civil Rights will collaborate with the Office of Enforcement and Compliance Assurance, Office of General Counsel, and Office of Human Resources to create a process to collect, retain, and analyze applicant flow data for Series 0905 Attorney positions.	December 2017
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:	
<p>EPA continues to develop and implement several modifications to this objective in an effort to identify whether Agency policy or practice caused the triggered identified.</p> <p>In FY 15, and as a part of EPA's strategic planning and organizational development efforts to create a more high performing organization, many program offices participated in the Voluntary Separation Incentive Payments (VSIP/Buy-Out) and Voluntary Early Retirement Authority (VERA/Early-Out). Specific grades, occupational series, and geographic locations were designated. This realigning of critical functions began with 256 EPA employees participating in this year's second phase since FY 14.</p> <p>ODACMO collaborated within OHR to compare data specifically related to recruitment events and national conferences of organizations which would lead to more effective Agency outreach opportunities. When ODACMO and OHR outreach efforts were reviewed, the number of recruitment events outnumbered the outreach opportunities; therefore, ODACMO focused its outreach events to national organizations of the demographics groups which are appear to have a lower than anticipated participation rate in the workforce.</p>	

The accomplishments below are numbered to correspond with the aforementioned planned activity.

1. The Shared Service Centers (SSC) issued guidance to all EPA management regarding the expected update to all position descriptions within FY 16.
2. OHR, as primary lead for recruitment plans, will continue to create a tool or process to track centrally coordinated recruitment activities. OHR currently tracks recruitment through an established SharePoint site; however, OHR will continue throughout FY 16 to create ways to analyze these efforts and to evaluate whether any agency policy, procedure or practice caused the identified trigger
5. OCR developed and presented a hiring satisfaction survey during a briefing held with EPA DCROs relating to the examination of EPA's hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified. This would allow the Agency to further understand standard or best practices that will promote EEO within the process. The briefing resulted in a request from Responsible Officials to consider alternative methods or further developing the survey idea when examining EPA hiring processes. OCR followed up and gained the support of other program offices to further develop the hiring satisfaction survey after OCR and OARM senior leadership meet to discuss the survey methods. Therefore, the planned activity was amended and extended.
6. OCR began discussions around the creation of a process to collect, retain, and analyze applicant flow data for Series 0905 Attorney positions. In FY 16, OCR will continue its work with all relevant programs to develop a means for EPA to track recruitment efforts and personnel transactions for this major occupation.

Part H-4: Standardize EEO Information Provided to New Employees and New Managers/Supervisors		
STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	(Part G: Q-3) Are new employees provided a copy of the EEO Policy Statement during orientation? Yes	
OBJECTIVE:	<p>To standardize EEO information provided to new employees and employees promoted into the supervisory ranks.</p> <p>Amended to: To streamline methods which convey EEO information (i.e., EEO policies; timely completion of No FEAR Act training) to new employees and employees promoted into the supervisory ranks.</p>	
RESPONSIBLE OFFICIAL:	<p>Director, Office of Civil Rights Director, Office of Human Resources Assistant Director, Office of Civil Rights, Affirmative Employment Analysis and Accountability Program</p>	
DATE OBJECTIVE INITIATED:	January 1, 2015	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2015	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)	
1. The Office of Human Resources will develop an agency-wide standard to ensure EEO-related documents are provided at all new employee orientations.	COMPLETED February 2015	
2. The Office of Civil Rights, in collaboration with the Office of Human Resources, will provide a copy of the Agency's EEO	COMPLETED September 2015	

Policy Statement in orientation packages for new employees at all Headquarters, Regional Offices, and Labs.	
3. Office of Human Resources, Program Management Officers, Equal Employment Officers and Area Lab Managers will ensure new employees complete the required No FEAR Act training within their first 90 days.	September 2017
4. Office of Human Resources, Program Management Officers, Equal Employment Officers and Area Lab Managers will create a system to track new employees' progress to complete required training.	September 2017
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:	
<p>The Agency created methods to standardize EEO information and provide it to new employees and employees promoted into the supervisory ranks.</p> <ol style="list-style-type: none"> 1. The Office of Civil Rights, in collaboration with the Office of Human Resources, established and implemented a process which allows all employees to receive the Agency's policies annually, specifically the Equal Employment Opportunity and Anti-Harassment policies. The policy statements are shared annually with all employees via email and a link directing them to the EPA intranet location. At the same time, the policies continue to be posted on the internet to allow applicants for EPA employment access to this information. 2. In FY 15, to ensure the EEO Policy Statement was consistently made a part of the new employee orientation package issued at EPA Headquarters, Regional Offices, and Labs, the OCR worked with OARM to develop a related process. As a result, the Office of Human Resources works with all components of the Agency to ensure consistency and necessary updates are included in all new employee orientation packages. <p><u>Amendment to the Objective</u></p> <p>The No FEAR Act training was made available to employees biennially in FY 14. EPA reached an overall participation rate of 99.5% during the training period. There was a 65% participation rate for new employees required to complete the training within their first 90 days of onboarding.</p> <p>Therefore, OCR will increase participation rates for new employees completing No FEAR Act Training in collaboration with program offices and senior management through efforts such as:</p>	

- Office of Human Resources, Program Management Officers, Equal Employment Officers and Area Lab Managers will ensure new employees complete the required mandatory training within their first 90 days.
- Office of Human Resources, Program Management Officers, Equal Employment Officers and Area Lab Managers will create a system to track new employees' progress to complete required training.

Part I-1: New Hires

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:

Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?

Data comparisons between the Relevant Civilian Labor Force (RCLF), application, qualification, and selection rates in certain major occupations revealed instances of lower than expected application, qualification, and/or selection rates.

BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine cause of the condition.

EPA reviewed the statistical data associated with new hires (Table A7) for employees in six of seven of its major occupations and the participation rates for the same major occupations - distribution by race/ethnicity and sex (Table A6), which is a proxy for the relevant application pool rate and is used for purposes of this report only. In addition, EPA conducted a four-year trend analysis that included FY 2012-2015. Although the exhaustive list of triggers is provided below, certain triggers were highlighted for illustrative purposes, but not because they were more important or significant than other triggers.

The seven major occupations include:

0028 Environmental Protection Specialist,
0301 Miscellaneous Administration and Program Specialist,
0343 Management/Program Analyst,
0401 General Biological Science (Research),
0819 Environmental Engineer (Research),
0905 General Attorney, and
1301 Physical/Environmental Scientist (Research).

Although 0905 General Attorneys constitute one of EPA's major occupations, data could not be gathered for this occupational series because of the unique characteristics that apply to the selection process associated with excepted service positions. As mentioned in the planned activities noted below, EPA plans to develop a process to collect all applicant flow data for 0905 General Attorneys in FY 17.

Application

For new hires, EPA identified application rate triggers by comparing the RCLF and application rates (Table A7) of the respective populations. For the fourth year in a row, Black Males, Black Females, Two or more Races Males, and Two or More Races Females have applied for positions at rates well above their representation in the RCLF in every major occupation series. For the third year in a row, Native Hawaiian Males have applied for positions at rates well above their representation in the RCLF in every major occupation series. For the first year, Hispanic Males, Hispanic Females, and American Indian Males have applied for positions at rates well above their representation in the RCLF in every major occupation series.

The triggers associated with the application rates of Asian and American Indian Females decreased in FY 15. For instance, when compared to three major occupations in FY 14, American Indian Females have applied for positions at rates equal to or higher to their representation in the RCLF in five major occupations:

0028 Environmental Protection Specialist;
0343 Management/Program Analyst;
0401 General Biological Science;
0819 Environmental Engineer; and
1301 Physical Scientist/Environmental Scientist.

In contrast, the application rates for White Males and Asian Males have not increased. In particular, the application rate triggers of Asian Males have been present for the last four years in the following major occupation series:

0301 Miscellaneous Administration and Program Specialist;
0343 Management/Program Analyst; and
1301 Physical Scientist.

Further in FY 15, the application rates in major occupation series 0301 and 0343 increased from 1.30% to 3.30% and 2.70% to 4.60%, respectively. Similarly, for the last two fiscal years (2014 and 2015), White Males have applied for positions at rates lower than their representation in the RCLF in every major occupation series.

Source: Table A6 and Table A7

The following chart details the specific race/national origin and sex groups that applied for major occupation positions at rates lower than their representation in the RCLF:

Race, National Origin and Sex	Occupational Series
White Males	0028, 0301, 0343, 0401, 0819, 1301
White Females	0028, 0301, 0343, 0401
Asian Males	0301, 0343, 1301
Asian Females	0301, 0401, 1301
Native Hawaiian Females	0819
American Indian Females	0301

EPA will examine whether barriers to equal employment opportunity exist using the aforementioned triggers. In particular, EPA will further examine whether there are Agency policies, practices or procedures that may cause certain race/national origin and sex groups to apply at rates less than anticipated for major occupation positions. EPA has planned a number of activities, which are detailed below in an attempt to identify a potential cause of the aforementioned triggers. After the planned activities are completed, EPA will evaluate the impact on the triggers noted above.

Qualification

For new hires, EPA identified qualification rate triggers by comparing the application and qualification rates (Table A7) of the respective populations. The triggers associated with the qualification rates of White Males identified in FY 14 decreased compared to FY 15. This year, White Males have qualified for positions at rates above their application rates in every major occupation series except the 0028 Environmental Protection Specialist occupation series, which was also a trigger in FY 14. Likewise, less qualification rate triggers were identified for Asian Males, Asian Females, Native Hawaiian Males, and American Indian Females in FY 15 than in FY 14.

On the other hand, for the past four fiscal years (2012, 2013, 2014, and 2015), Hispanic Males have qualified for positions at rates lower than their application rates in all major occupations:

0028 Environmental Protection Specialist;
 0301 Miscellaneous Administration and Program Specialist;
 0343 Management/Program Analyst;
 0401 General Biological Science;

0819 Environmental Engineers; and
1301 Physical Scientist.

Similarly, for the last three fiscal years (2013, 2014, and 2015), Black Males have also qualified for positions at rates lower than their application rates in all major occupations. In FY 12, qualification triggers were identified in all major occupations except 1301 Physical Scientist.

Furthermore, for the first year, Hispanic Females have also qualified for positions at rates lower than their application rates in four major occupations:

0028 Environmental Protection Specialist;
0301 Miscellaneous Administration and Program Specialist;
and
0401 General Biological Science, and 1301 Physical Scientist.

From FY 14 to FY 15, the representation of Hispanic Females in the qualified pool for the 0028 Environmental Protection Specialist occupational series decreased even though their application rate increased. For instance, from FY 14 to FY 15, the application rates of Hispanic Females for positions in the 0028 Environmental Protection Specialist occupational series increased from 4.90% to 5.40%, but their qualification rates nevertheless fell from 5.60% to 5.30% during this same period.

Similarly, the triggers associated with the qualification rates of American Indian Males and Two or More Races Males increased in FY 15. In FY 15, the following qualification rate triggers were present even though they were not identified in FY 14:

- 1) American Indian Males in the 0028 Environmental Protection Specialist, 0343 Management/Program Analyst, and 1301 Physical Scientist occupational series; and
- 2) Two or More Races Males in the 0343 Management/Program Analyst, 0401 General Biological Science, and 1301 Physical Scientist occupational series.

Source: Table A6 and Table A7

The following chart details the specific race/national origin and sex groups that were qualified for major occupation positions at rates lower than their application rates:

Race, National Origin and Sex	Occupational Series
Hispanic Males	0028, 0301, 0343, 0401, 0819, 1301
Hispanic Females	0028, 0301, 0401, 1301
White Males	0028
Black Males	0028, 0301, 0343, 0401, 0819, 1301
Black Females	0028, 0819
Asian Females	0343, 1301
Native Hawaiian Males	0301
Native Hawaiian Females	0301
American Indian Males	0028, 0301, 0343, 0401, 1301
Two or More Race Males	0028, 0301, 0343, 0401, 1301
Two or More Race Females	0301

EPA will examine whether barriers to equal employment opportunity exist using the aforementioned triggers. In particular, EPA will further examine whether there are Agency policies, practices or procedures that may cause certain race/national origin and sex groups to be qualified at rates less than anticipated for major occupation positions. EPA has planned a number of activities, which are detailed below in an attempt to identify a potential cause of the aforementioned triggers. After the planned activities are completed, EPA will evaluate the impact on the triggers noted above.

Selection

For new hires, EPA identified selection rate triggers by comparing the qualification and selection rates (Table A7) of the respective populations. The triggers associated with the selection rates of Hispanic Males, Hispanic Females, and Asian Females decreased in FY 15. Specifically, from FY 14 to 15, the selection rates of Hispanic Males for positions in the 0028 Environmental Protection Specialist occupational series increased from 4.80% to 6.20% and in the 0819 Environmental Engineer occupational series, increased from 4.20% to 6.20%. Similarly, from FY 14 to 15, the selection rates of Asian Males for positions in the 0819 Environmental Engineer occupational series increased from 6.90% to 12.50%

In contrast, triggers associated with the selection rates of White Males, Black Females, Native Hawaiian Males, American Indian

Males, and Two or More Race Females have increased in FY 15. In FY 15, the following qualification rate triggers were present even though they were not identified in FY 14: 1) White Males in the 0343 Management/Program Analyst and 0401 General Biological Science occupational series; 2) Black Females in the 0028 Environmental Protection Specialist and 0819 Environmental Engineer occupational series; 3) Native Hawaiian Males in the 0343 Management/Program Analyst and 0819 Environmental Engineer occupational series; and 4) Two or More Races Females in the 0028 Environmental Protection Specialist and 0819 Environmental Engineer occupational series. Accordingly, in FY 14, triggers were associated with the selection rates of White Males, Black Females, Native Hawaiian Males, American Indian Males, and Two or More Race Females, which were not present in FY 13.

Overall, there was an increase in selection rate triggers for FY 15 when compared to FY 14.

Source: Table A6 and Table A7

The following chart details the specific race/national origin and sex groups that were selected for major occupation positions at rates lower than their qualification rates:

Race, National Origin and Sex	Occupational Series
Hispanic Males	0301, 0343, 1301
Hispanic Females	0301, 1301
White Males	0301, 0343, 0401, 0819, 1301
Black Males	0028, 0301, 0401, 0819, 1301
Black Females	0028, 0819
Asian Males	0028, 0301, 0343, 0401, 1301
Asian Females	0301, 0343, 1301
Native Hawaiian Males	0028, 0301, 0343, 0401, 0819, 1301
Native Hawaiian Females	0028, 0301, 0343
American Indian Males	0028, 0301, 0343, 0401, 0819
American Indian Females	0028, 0301, 0343, 0401, 0819, 1301
Two or More Race Males	0028, 0301, 0343, 0401, 0819, 1301
Two or More Race Females	0028, 0301, 0343, 0401, 0819, 1301

EPA will examine whether barriers to equal employment opportunity exist using the aforementioned triggers. In particular,

	<p>EPA will further examine whether there are Agency policies, practices or procedures that may cause certain race/national origin and sex groups to be selected at rates less than anticipated for major occupation positions. EPA has planned a number of activities, which are detailed below in an attempt to identify a potential cause of the aforementioned triggers. After the planned activities are completed, EPA will evaluate the impact on the triggers noted above.</p>
<p>STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of EPA policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>At this time, EPA continues to investigate whether any specific policy, practice, or procedure is causing any of the identified lower than expected participation rates. In FY 15, EPA implemented the following planned activities to determine what may have caused the less than anticipated application, qualification, and selection rates: 1) provided agency-wide SEPM training to enhance diversity, inclusion and equal employment opportunities; 2) created a tool to track centrally coordinated recruitment activities; and 3) incorporated relevant civilian labor force data into the Diversity Dashboard to increase the utilization of the Diversity Dashboard in developing and monitoring the effectiveness of targeted outreach strategies.</p> <p>Nonetheless, EPA's application, qualification, and selection rates suggest that it should closely examine: 1) its outreach and recruitment policies, practices and procedures for the 0301 Misc. Administration and Program Specialist occupational series to determine whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups not to apply; 2) its qualification policies and practices for the 0028 Environmental Protection Specialist, 0301 Misc. Administration and Program Specialist, and 1301 Physical Scientist occupational series to determine whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups not to be found qualified for these positions; and 3) its selection policies and practices for the 0028 Environmental Protection Specialist, 0343 Management/Program Analyst, 0401 General Biological Science, and 1301 Physical Scientist occupational series to determine whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups not to be selected for positions.</p>
<p>OBJECTIVE: State the alternative or revised Agency policy, procedure or practice to be</p>	<p>EPA will continue its analysis of the hiring process, including recruitment, qualification and selection, associated with the above-identified lower than expected participation rates for several occupational series.</p>

implemented to correct the undesired condition.	
RESPONSIBLE OFFICIALS:	Acting Assistant Administrator, Office of Administration & Resources Management Director, Office of Civil Rights Director, Office of Human Resources Deputy Civil Rights Officials
DATE OBJECTIVE INITIATED:	February 15, 2011
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2017
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
1. The Office of Diversity, Advisory Committee Management and Outreach will collaborate with the Office of Human Resources to create a tool to track centrally coordinated recruitment activities.	Completed June 2015
2. The Office of Administration and Resources Management will provide agency-wide SEPM training to enhance diversity, inclusion and equal employment opportunities.	Completed August 2015
3. The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to develop a management hiring satisfaction survey to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified. Amended to: The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to identify an alternative method(s) or tool(s) which allow the Agency to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified.	Amended September 2016

4. The Office of Diversity, Advisory Committee Management and Outreach will incorporate relevant civilian labor force data into the Diversity Dashboard to increase the utilization of the Diversity Dashboard in developing and monitoring the effectiveness of targeted outreach strategies.	Completed September 2015
5. The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to assess whether OCR position descriptions accurately reflect the job duties of major occupations where lower than anticipated application, qualification, and selection rates are identified.	September 2016
6. The Office of Human Resources will coordinate and collaborate with the Office of Civil Rights to evaluate the data from the management hiring satisfaction survey to determine whether there are any procedural barriers associated with the development of vacancy announcements and outreach efforts.	September 2017
7. The Office of Civil Rights will collaborate with the Office of Human Resources to evaluate the effectiveness of its strategic recruitment plan and guidance document and make necessary modifications or changes.	September 2016
8. The Office of Civil Rights will collaborate and coordinate with Regions and Programs/Offices that employ series 0905 Attorneys to develop and implement a process to collect, retain, and analyze applicant flow data for series 0905 Attorney positions.	September 2017
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:	
<p>EPA observed some changes in the application, qualification, and selection rates of certain race/national origin and sex groups. In particular, the triggers associated with the application rates of Hispanic Males, Hispanic Females, and American Indian Males; and qualification rates of White Males and American Indian Females diminished in FY 15. Furthermore the selection rates of Hispanic Males, Asian Males, and Asian Females increased in FY 15.</p> <p>The accomplishments below are numbered to correspond with the aforementioned planned activity.</p>	

1. The Office of Diversity, Advisory Committee Management and Outreach collaborated with the Office of Human Resources to create a tool to track centrally coordinated recruitment activities. ODACMO compared OHR's recruitment events to national conferences of organizations which would provide the Agency outreach opportunities. The number of recruitment events outnumbered the outreach opportunities; therefore, ODACMO focused its outreach events on national organizations of the demographics groups which have a lower than anticipated participation rate in the Agency's workforce. OHR as primary lead for recruitment plans, will continue activities related to the creation of a tool or process to track centrally coordinated recruitment activities. OHR tracks recruitment through an established SharePoint site; however, OHR will continue throughout FY 16 to create ways to analyze these efforts, including analyzing whether any agency policy, practice or procedure may have caused the identified triggers
2. In addition, OCR and ODACMO provided a one-day training on "How to Manage a Special Emphasis Program." The purpose of this training was to provide basic tools for the Special Emphasis Program Managers to understand their roles and to empower them as they assist management promote EEO. The training included topics such as: differences between EEO and Affirmative Employment & Diversity; federal laws governing special emphasis programs; roles of SEPMs; developing work plans and actions, and best practices. Approximately 113 SEPMs from Headquarters, Regions, and Labs participated in person or via video teleconference.
3. (Includes #6) OCR efforts to examine the hiring processes in major occupations will continue. In FY 15, OCR developed and presented a hiring satisfaction survey during a briefing held with EPA DCROs, relating to the examination of EPA's hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified. The survey would allow the Agency to further understand standard or best practices that will enhance diversity within the process. The briefing resulted in a request from Responsible Officials to consider alternative methods or further developing the survey idea when examining EPA hiring processes. OCR followed up and gained the support of other program offices to further develop the hiring satisfaction survey after OCR and OARM senior leadership meet to discuss the survey methods. Therefore, the planned activity was amended and extended.

PART I-2: Internal Competitive Promotions

STATEMENT OF
CONDITION THAT WAS A
TRIGGER FOR A
POTENTIAL BARRIER:

Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?

Data comparisons between the application, qualification, and selection rates for internal competitive promotions in some major occupations revealed instances of lower than expected application, qualification, and/or selection rates.

BARRIER ANALYSIS:

Provide a description of the steps taken and data analyzed to determine cause of the condition.

EPA reviewed the statistical data associated with internal promotions (Table A9) for employees in six of seven of its major occupations and the participation rates for the same major occupations - distribution by race/ethnicity and sex (Table A6), which is a proxy for the relevant application pool rate and is used for purposes of this report only. In addition, EPA conducted a four-year trend analysis that includes FY 12 - FY 15. Although the exhaustive list of triggers is provided in each personnel transaction section, certain triggers were highlighted for illustrative purposes, but not because they were more important or significant than other triggers.

The seven largest occupations include:

0028 Environmental Protection Specialist;
0301 Miscellaneous Administration and Program Specialist;
0343 Management/Program Analyst;
0401 General Biological Science (Research);
0819 Environmental Engineer (Research);
0905 General Attorney; and
1301 Physical/Environmental Scientist (Research).

Although 0905 General Attorneys constitute one of EPA's major occupations, data could not be completely gathered for this occupational series for the reasons stated above.

Application

For internal competitive promotions, EPA identified application rate triggers by comparing the participation rates of groups in major occupations by race, national origin, and sex (Table A6) and application rates of the respective populations (Table A9). EPA

recognizes that not every person in a major occupation may actually apply for an internal competitive promotion, but EPA elected to use this as a proxy for the application rate, for purposes of this report only.

In FY 15, the application rates of Asian Females was greater than their relevant applicant pool rates in all major occupations as compared to FY 14, when they had application rate triggers in four major occupations:

0301 Miscellaneous Administration and Program Specialist;
0401 General Biological Science;
0819 Environmental Engineer; and
1301 Physical Scientist.

Similarly, triggers associated with the application rates of Black Females and Asian Males decreased from FY 14 to FY 15.

However, the application rates for Hispanic Females, White Males, White Females, Native Hawaiian Females, and American Indian Males and Females have not improved. Specifically, the application rates for White Males, Native Hawaiian Males, and Two or More Race Males and Females were lower than their relevant applicant pool rates in more major occupations than in FY 14. For instance, in FY 15, White Males had application rate triggers in four major occupations as compared to FY 14, when triggers were identified in two major occupation series: 0401 General Biological Science and 0819 Environmental Engineers.

For the past four fiscal years (2012, 2013, 2014, 2015), the application rates of White Females was lower than their representation in the relevant applicant pool in five major occupations:

0028 Environmental Protection Specialist;
0301 Miscellaneous Administration and Program Specialist;
0343 Management/Program Analyst;
0401 General Biological Science; and
1301 Physical Scientist.

Source: Table A6 and Table A9

The following chart details the specific race/national origin and sex groups that applied for internal promotions at rates lower than their representation in the relevant occupations:

Race, National Origin and Sex	Occupational Series
Hispanic Males	1301
Hispanic Females	1301
White Males	0028, 0401, 0819, 1301
White Females	0028, 0301, 0343, 0401, 1301
Black Females	0301, 0343
Asian Males	0301
Native Hawaiian Males	0343
Native Hawaiian Females	0028, 0819
American Indian Males	0819, 1301
American Indian Females	0028, 0343, 0401, 0819, 1301
Two or More Race Males	0819, 1301
Two or More Race Females	0401, 0819

EPA will examine whether barriers to equal employment opportunity exist using the aforementioned triggers. In particular, EPA will further determine whether there are Agency policies, practices or procedures that may cause certain race/national origin and sex groups to apply for promotions in major occupations at rates that are less than anticipated. EPA has planned a number of activities, which are detailed below in an attempt to identify a potential cause of the aforementioned triggers. After the planned activities are completed, EPA will evaluate the impact on the triggers noted above.

Qualification

For internal competitive promotions, EPA identified qualification rate triggers by comparing the application and qualification rates (Table A9) of the respective populations. In FY 15, the qualification rates of American Indian Females and Two or More Races Males were higher than their application rates in all major occupations as compared to FY 14, when they had qualification rate triggers in at least four major occupations. For instance in FY 14, the following qualification rate triggers were present for American Indian Females:

0028 Environmental Protection Specialist;
0343 Management Analysis;
0819 Environmental Engineer; and
1301 Physical Scientist.

Similarly, triggers associated with the qualification rates of Hispanic Males, White Males, Black Males, and American Indian Males decreased from FY 14 to FY 15.

However, the qualification rates of Black Females, Asian Males, and Asian Females were lower than their application rates in more major

occupations than in FY 14. For instance, in FY 15, the 1301 Physical Scientist occupation series was a qualification rate trigger and was present for the aforementioned race and national origin groups even though it was not identified in FY 14.

Overall, there were more improvements than increases in qualification rate triggers.

Source: Table A6 and Table A9

The following chart details the specific race/national origin and sex groups that are qualified for major occupation positions at rates lower than their application rates:

Race, National Origin and Sex	Occupational Series
Hispanic Males	0301,0343, 0401, 0819
Hispanic Females	1301
White Males	0028, 0343, 0819, 1301
White Females	1301
Black Males	0028, 0301,0343
Black Females	0301, 0401,1301
Asian Males	0028, 0343, 0401, 0819, 1301
Asian Females	0401, 1301
American Indian Males	0028, 0401
Two or More Race Females	0301,0343

EPA will examine whether barriers to equal employment opportunity exist using the aforementioned triggers. EPA will further determine whether there are Agency policies or practices that may cause certain race/national origin and sex groups to be deemed qualified at rates that are less than their application rate for major occupation internal promotions. EPA has planned a number of activities, which are detailed below, in an attempt to identify a potential cause of the aforementioned triggers. After the planned activities are completed, EPA will evaluate the impact on the triggers noted above.

Selection

For internal competitive promotions, EPA identified selection rate triggers by comparing the qualification and selection rates (Table A9) of the respective populations. In FY 15, the selection rates of White Females was higher than their qualification rates in all major occupations unlike in FY 14, when they had selection rate triggers in one major occupation: 0301 Miscellaneous Administration and Program Specialist. Moreover, triggers associated with the qualification rates of Black Males, Native Hawaiian Males, and American Indian Females decreased from FY 14 to FY 15.

However, the selection rates of Black Females, Asian Males and Females, American Indian Males, and Two or More Races Males and Females have not improved. In particular, the selection rates triggers of Asian Males has steadily increased. In FY 15, selection rates were lower than their qualification rates in all major occupations, compared to five major occupations in FY 14 and four major occupations in FY 13. Similarly, triggers associated with the selection rates of Hispanic Males and Females increased from FY 14 to FY 15.

Source: Table A6 and Table A9

The following chart details the specific race/national origin and sex groups that are selected for major occupation positions at rates lower than their qualification rates:

Race, National Origin and Sex	Occupational Series
Hispanic Males	0819, 0343, 0819
Hispanic Females	0301, 0819
White Males	0301, 0343, 0401, 0819
Black Males	0028, 0301, 1301
Black Females	0028, 0343, 0819
Asian Males	0028, 0301, 0343, 0401, 0819, 1301
Asian Females	0028, 0301, 0401, 1301
Native Hawaiian Males	0301
American Indian Males	0028, 0301, 0343, 0401
American Indian Females	0301
Two or More Race Males	0028, 0301, 0343, 0401
Two or More Race Females	0028, 0343, 0401, 1301

EPA will examine whether barriers to equal employment opportunity exist using the aforementioned triggers. In particular, EPA will determine whether there are Agency policies or practices that may cause certain race/national origin and sex groups to be selected at rates that are less than their qualification rate for major occupation internal promotions. EPA has planned a number of activities, which are detailed below, in an attempt to identify a potential cause of the aforementioned triggers. After the planned activities are completed, EPA will evaluate the impact on the triggers noted above.

STATEMENT OF IDENTIFIED BARRIER:

At this time, EPA continues to evaluate whether any specific Agency policy, practice, or procedure is causing any of the identified lower than expected participation rates. In FY 15, EPA implemented

Provide a succinct statement of EPA policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<p>several initiatives to foster a work environment that nurtures and advances the talents, drive, and interests of all employees in an attempt to determine what may have caused the less than anticipated application, qualification, and selection rates.</p> <p>Nonetheless, EPA's application, qualification, and selection rates suggest that it should closely examine: 1) its solicitation and career development policies, practices and procedures for the 0819 Environmental Engineer and 1301 Physical Scientist occupational series to determine whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups not to apply; 2) its qualification policies and practices for the 0401 General Biological Science, 0819 Environmental Engineer, and 1301 Physical Scientist occupational series to determine whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups not to be found qualified for these positions; and 3) its selection policies and practices for the 0301 Miscellaneous Administration and Program Specialist and 0343 Management Analysis occupational series to determine whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups not to be selected for positions.</p>
<p>OBJECTIVE:</p> <p>State the alternative or revised Agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	EPA will continue its analysis of the application, qualification and selection policies and practices associated with the above-identified lower than expected qualification and selection rates for several occupational series.
RESPONSIBLE OFFICIAL:	<p>Acting Assistant Administrator, Office of Administration & Resources Management</p> <p>Director, Office of Civil Rights</p> <p>Director, Office of Human Resources</p> <p>Deputy Civil Rights Officials</p>
DATE OBJECTIVE INITIATED:	February 15, 2011
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2017

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
<p>1. The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to develop a management hiring satisfaction survey to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified.</p> <p>Amended to: The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to identify an alternative method(s) or tool(s) which allow the Agency to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified.</p>	<p>Amended September 2016</p>
<p>2. The Office of Administration and Resources Management will provide agency-wide SEPM training to enhance diversity, inclusion and equal employment opportunities.</p>	<p>Completed August 2015</p>
<p>3. The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to create a tool or process to collect relevant applicant pool data.</p>	<p>September 2016</p>
<p>4. The Office of Human Resources will coordinate and collaborate with the Office of Civil Rights to evaluate the data from the management hiring satisfaction survey to determine whether there are any procedural barriers associated with the development of vacancy announcements and outreach efforts.</p>	<p>September 2017</p>
<p>5. The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to evaluate the effectiveness of its strategic recruitment plan and guidance document and make necessary modifications or changes.</p>	<p>September 2016</p>
<p>6. The Office of Civil Rights will collaborate and coordinate with Regions and Programs/Offices that employ series 0905 Attorneys to develop and implement a process to collect, retain, and analyze applicant flow data for series 0905 Attorney positions.</p>	<p>September 2017</p>

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| 7. The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to create a tool to assess effectiveness of career development activities. | September 2017 |
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REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:

The accomplishments below are numbered to correspond with the aforementioned planned activity.

1. (Includes #4) OCR efforts to examine the hiring processes in major occupations will continue in FY 15. OCR developed and presented a hiring satisfaction survey during a briefing held with EPA Deputy Civil Rights Officials, relating to the examination of EPA's hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified. This survey would allow the Agency to further understand standard or best practices that will enhance diversity within the process. The briefing resulted in a request from Responsible Officials to consider alternative methods or further developing the survey idea when examining EPA hiring processes. OCR followed up and gained the support of other program offices to further develop the hiring satisfaction survey after OCR and OARM senior leadership meet to discuss the survey methods. Therefore, the planned activity was amended and extended.
2. The Offices of Civil Rights and Diversity, Advisory Committee Management, and Outreach provided a one-day training on "How to Manage a Special Emphasis Program." The purpose of this training was to provide basic tools for the SEPMs to understand roles and their empowerment to assist management in removing barriers to Equal Employment Opportunity. The training included topics such as: differences between EEO and Affirmative Employment & Diversity; federal laws governing special emphasis programs; roles of SEPMs; developing work plans and actions, as well, best practices. Approximately 113 SEPMs from Headquarters, Regions, and Labs participated in person or via video teleconference.
3. OCR began discussions with OARM on the need to create a tool or process to collect relevant applicant pool data for Internal Competitive Promotions for Major Occupations (Table A-9); however, due to competing priorities in both offices the recommendation was to further discuss these efforts in FY 16.

PART I-3: Senior Grades	
<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?</p>	<p>Data comparisons between the respective feeder pools (one grade below the grade being analyzed), application, qualification, and selection rates revealed instances of lower than expected application, qualification and/or selection rates.</p>
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>EPA reviewed the statistical data associated with Internal Selections for Senior Level Positions (Table A11) and the participation rates for general schedule grades by race/ethnicity and sex (Table A4), which is a proxy for the relevant application pool and is used for purposes of this report only. In addition, EPA conducted a four-year trend analysis that includes FY 2012-2015. Although the exhaustive list of triggers is provided in each personnel transaction section, certain triggers were highlighted for illustrative purposes, but not because they were more important or worse than other triggers.</p> <p>Application</p> <p>For the senior grades, EPA identified application rate triggers by comparing the participation rate of the respective populations at the next lower grade (e.g. the feeder pool for GS 13 Hispanic Females is their overall representation at the GS 12 level) (Table A4) and application rates (Table A11) of the respective populations.</p> <p>The application rates of Hispanic, Black, and Asian Males exceeded their representation in the next lowest grade at every senior grade level and has steadily increased from FY 12 to FY 15. In contrast, in FY 14, triggers were associated Asian Males with their application rates at the GS 15 level. Likewise, in FY 15, no application rate triggers were associated with Asian Females as compared to FY 14, when triggers were identified at the GS 13 and 14 levels.</p> <p>Conversely, in FY 15, application rates of White Males was lower than their relevant applicant pool rate at every senior grade level, resulting in a new triggers as compared to FY 14, when triggers were identified at the GS 14 level. Additionally, for the past four fiscal years (2012, 2013,</p>

2014, and 2015), the application rates for White Females was lower than their relevant applicant pool rate at every senior grade level.

Source: Table A4 and Table A11

The following chart details the specific race/national origin and sex groups that applied for Senior Grade positions at rates lower than their representation in the relevant feeder pool:

Race, National Origin and Sex	Grades
Hispanic Females	GS 13
White Males	GS 13, GS 14, GS 15
White Females	GS 13, GS 14, GS 15
Black Females	GS 13
Native Hawaiian Males	GS 15
Native Hawaiian Females	GS 13, GS 14, GS 15
American Indian Females	GS 14, GS 15
Two or More Race Females	GS 13
Two or More Race Males	GS 13

EPA will examine whether barriers to equal employment opportunity exist using the aforementioned triggers. In particular, EPA will assess whether there are Agency policies, practices or procedures that may cause certain race/national origin and sex groups to apply for Senior Grade positions at rates that are less than anticipated. EPA has planned a number of activities, which are detailed below, in an attempt to identify a potential cause of the aforementioned triggers. After the planned activities are completed, EPA will evaluate the impact on the triggers noted above.

Qualification

For the senior grades, EPA identified qualification rate triggers by comparing application and qualification rates (Table A11) of the respective populations. For the past two fiscal years (2014 and 2015), the qualification rates of Hispanic Females exceeded their application rates at every senior grade level as compared to FY 13 and FY 12, when triggers were associated with their qualification rates at the GS 14 level. Likewise, qualification rate triggers associated with Two or More Race Males have decreased. Specifically, compared to last fiscal year GS 14 level qualification rates doubled and more than tripled at the GS 15 level; triggers at these levels were previously identified in FY 14 and FY 12.

In contrast, for the past three fiscal years (2013, 2014 and 2015), the qualification rates of American Indian Males were lower than their

application rates at the GS 13 and GS 14 levels, even though the qualification rates have steadily increased from FY 13 to FY 14. Furthermore, the qualification rates triggers of Hispanic Males were identified at every senior grade level for the fourth year in a row (2012, 2013, 2014 and 2015); even though there was an increase in the qualification rates.

Source: Table A4 and Table A11

The following chart details the specific race/national origin and sex groups that were found qualified at levels below their respective application rates:

Race, National Origin and Sex	Grades
Hispanic Males	GS 13, GS 14, GS 15
White Males	GS 13, GS 15
Black Males	GS 13, GS 14, GS 15
Black Females	GS 15
Asian Males	GS 13
American Indian Males	GS 13, GS 14
American Indian Females	GS 13, GS 15
Two or More Race Males	GS 13
Two or More Race Females	GS 13, GS 14

EPA will examine whether barriers to equal employment opportunity exist using the aforementioned triggers. In particular, EPA will further assess whether there are Agency policies, practices, or procedures that may cause certain race/national origin and sex groups to be qualified for Senior Grade positions at rates that are less than anticipated. EPA has planned a number of activities, which are detailed below, in an attempt to identify a potential cause of the aforementioned triggers. After the planned activities are completed, EPA will evaluate the impact on the triggers noted above.

Selection

For the senior grades, EPA identified selection rate triggers by comparing application and qualification rates (Table A11) of the respective populations. EPA experienced some small increases in the selection rates at the senior grade levels. For instance, the selection rates of White Females exceeded their qualification rates at every senior grade level as compared to FY 12 through FY 14, when triggers were associated with their selection rates at the GS 13 level. Additionally, selection rate triggers for Asian Females at the GS 13 level decreased after three fiscal years (2012, 2013, and 2014). Similarly, selection rate triggers for Hispanic Males at the GS 13 level were eliminated after two

fiscal years (2013 and 2014). Likewise, selection rate triggers associated with White Males decreased. White Males exceeded their qualification rates at the GS 14 and GS 15 levels as compared to FY 14, when triggers were identified.

In contrast, the selection rate triggers of Black Males increased. For instance, in FY 15, the selection rates of Black Males were lower than their qualification rates at more senior grade levels as compared to FY 14, when the previous triggers were only identified at the GS 15 level. Also, selection rate triggers identified in FY 12 for White Males at the GS 13 level reemerged in FY 15, after disappearing in FY 13 and 2014. Similarly, selection rate triggers identified in FY 13 for Black Females and Two or More Males and Females at the GS 15 level reemerged after disappearing in FY 14.

Source: Table A4 and Table A11

The following chart details the specific race/national origin and sex groups that were selected at levels below their respective qualification rates:

Race, National Origin and Sex	Grades
Hispanic Males	GS 14
Hispanic Females	GS 13, GS 15
White Males	GS 13
Black Males	GS 13, GS 15
Black Females	GS 14, GS 15
Asian Males	GS 13, GS 14
Asian Females	GS 13, GS 15
Native Hawaiian Males	GS 13
Native Hawaiian Females	GS 13
American Indian Males	GS 13, GS 14, GS 15
American Indian Females	GS 13, GS 14
Two or More Race Males	GS 14
Two or More Race Females	GS 15

EPA will examine whether barriers to equal employment opportunity exist using the aforementioned triggers. In particular, EPA will further assess whether there are Agency policies, practices or procedures that may cause certain race/national origin and sex groups to be selected for Senior Grade positions at rates that are less than anticipated. EPA has planned a number of activities, which are detailed below, in an attempt to identify a potential cause of the aforementioned triggers. After the planned activities are completed, EPA will evaluate the impact on the triggers noted above.

<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of EPA policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>At this time, EPA continues to evaluate whether any specific Agency policy, practice, or procedure is causing any of the identified lower than expected participation rates. In FY 15, EPA implemented several initiatives to foster a work environment that nurtures and advances the talents, drive, and interests of all employees in an attempt to determine what may have caused the less than anticipated application, qualification, and selection rates.</p> <p>Nonetheless, EPA's application, qualification, and selection rates suggest that it should closely examine: 1) its solicitation and career development policies, practices and procedures for the GS 13 level to determine whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups not to apply; 2) its qualification policies and practices for the GS 13 level to determine whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups not to be found qualified for these positions; and 3) its selection policies and practices for the GS 13 and GS 15 level to determine whether any Agency policy, practice or procedure is causing certain race/national origin and sex groups not to be selected for positions.</p>
<p>OBJECTIVE:</p> <p>State the alternative or revised Agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>EPA will continue its analysis of the application, qualification and selection policies and practices associated with the above-identified lower than expected qualification and selection rates for several occupational series.</p>
<p>RESPONSIBLE OFFICIAL:</p>	<p>Acting Assistant Administrator, Office of Administration & Resources Management Director, Office of Civil Rights Director, Office of Human Resources Deputy Civil Rights Officials</p>
<p>DATE OBJECTIVE INITIATED:</p>	<p>February 15, 2011</p>
<p>TARGET DATE FOR COMPLETION OF OBJECTIVE:</p>	<p>September 30, 2017</p>

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
<p>1. The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to develop a management hiring satisfaction survey to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified.</p> <p>Amended to: The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to identify an alternative method(s) or tool(s) which allow the Agency to examine the hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified.</p>	<p>Amended September 2016</p>
<p>2. The Office of Administration and Resources Management will provide agency-wide SEPM training to enhance diversity, inclusion and equal employment opportunities.</p>	<p>Completed August 2015</p>
<p>3. The Office of Human Resources will evaluate the effectiveness of its strategic recruitment plan and guidance document and make necessary modifications or changes.</p>	<p>Completed September 2015</p>
<p>4. The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to create a tool or process to collect relevant applicant pool data.</p>	<p>September 2017</p>
<p>5. The Office of Human Resources will coordinate and collaborate with the Office of Civil Rights to evaluate the data from the management hiring satisfaction survey to determine whether there are any procedural barriers associated with the development of vacancy announcements and outreach efforts.</p>	<p>September 2017</p>
<p>6. The Office of Civil Rights will collaborate and coordinate with Regions and Programs/Offices that employ series 0905 Attorneys to develop and implement a process to collect, retain, and analyze applicant flow data for series 0905 Attorney positions.</p>	<p>September 2017</p>
<p>7. The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to create a tool or process to assess effectiveness of career development activities.</p>	<p>September 2017</p>

8. The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to create a tool or process to evaluate the distribution of awards.	September 2017
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REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:

The accomplishments below are numbered to correspond with the aforementioned planned activity.

1. (Applies to planned activity #5 as well) OCR efforts to examine the hiring processes in major occupations will continue in FY 15. OCR developed and presented a hiring satisfaction survey during a briefing held with EPA DCROs, relating to the examination of EPA's hiring processes in major occupations where lower than anticipated application, qualification, and selection rates are identified. This survey would allow the Agency to further understand standard or best practices that will enhance diversity within the process. The briefing resulted in a request from Responsible Officials to consider alternative methods or further developing the survey idea when examining EPA hiring processes. OCR followed up and gained the support of other program offices to further develop the hiring satisfaction survey after OCR and OARM senior leadership meet to discuss the survey methods. Therefore, the planned activity was amended and extended.
2. In addition, OCR and ODACMO provided a one-day training on "How to Manage a Special Emphasis Program." The purpose of this training was to provide basic tools for the SEPMs to understand their roles and to empower them as they assist management in removing barriers to Equal Employment Opportunity. The training included topics such as: differences between EEO and Affirmative Employment & Diversity; federal laws governing special emphasis programs; roles of SEPMs; developing work plans and actions, as well, best practices. Approximately 113 SEPMs from Headquarters, Regions, and Labs participated in person or via video teleconference.
3. ODACMO collaborated with OHR to create a tool to track centrally coordinated recruitment activities. ODACMO compared OHR's recruitment events to national conferences of organizations which would provide the agency outreach opportunities. The number of recruitment events outnumber the outreach opportunities; therefore, ODACMO focused its outreach events to national organizations of the demographics groups which have a lower than anticipated participation rate in the agency's workforce.
4. OCR discussed with OARM the need to create a tool or process to collect relevant applicant pool data for Internal Competitive Promotions for Senior Level Grades (GS 13,14, and 15) (Table A-11); however, due to competing priorities in both offices the recommendation was to move the meeting date to FY 16.

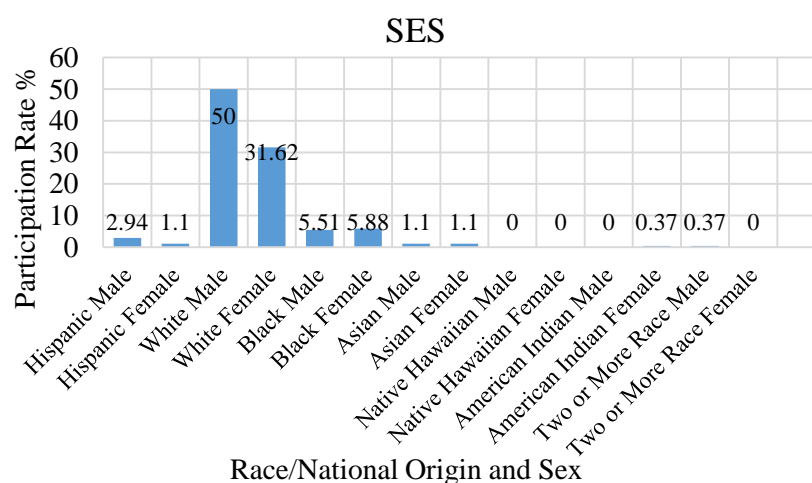
PART I-4: Senior Executive Service

STATEMENT OF
CONDITION THAT
WAS A TRIGGER FOR
A POTENTIAL
BARRIER:

Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?

The Agency has not acquired detailed information on internal applicants to SES vacancies to conduct a comprehensive analysis of the Senior Executive Service workforce.

NOTE: Internal applicants are members of the SES or SES Candidate Development Program graduates. The Agency collected the FY 15 workforce participation rates for the SES, which are graphically represented below.



BARRIER ANALYSIS:

Provide a description of the steps taken and data analyzed to determine cause of the condition.

The first system to collect applicant flow data related to external applicants for SES vacancies was launched in FY 11. The process for when selections are made includes a retrospective analysis of applicant flow data related to determinations on best qualified candidates for the vacancies is conducted and reported.

The Agency must collect and analyze detailed information on internal applicants to SES vacancies before it can determine whether any policy, practice or procedure that has caused the aforementioned SES workforce data.

EPA has planned a number of activities to promote our examination of internal SES data, which are detailed below.

STATEMENT OF
IDENTIFIED
BARRIER:

At this time, it is not possible to identify if there is a specific hiring or promotion process policy, practice, or procedure that may be impacting the representation of any group in the SES. EPA will collect and

Provide a succinct statement of EPA policy, procedure or practice that has been determined to be the barrier of the undesired condition.	analyze more detailed information on internal applicants to SES vacancies in FY 16.
OBJECTIVE: State the alternative or revised Agency policy, procedure or practice to be implemented to correct the undesired condition.	EPA will work to continue its efforts to enhance its automated data capture capabilities for internal SES hires.
RESPONSIBLE OFFICIAL:	Acting Assistant Administrator, Office of Administration & Resources Management Director, Office of Civil Rights Director, Office of Human Resources Deputy Civil Rights Officials Deputy Civil Rights Officials
DATE OBJECTIVE INITIATED:	October 1, 2013
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2018
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
1. The Office of Civil Rights will collaborate with the Office of Administration and Resources Management to develop a process for collecting and analyzing more detailed information on internal applicants to SES vacancies in accordance with the requirements of MD-715.	September 2016
2. The Office of Civil Rights will collaborate with Office of Human Resources to collect and analyze applicant flow data for internal applicants to SES vacancies in accordance with the requirements of MD-715.	September 2016
3. The Office of Human Resources will launch a Learning Management System to track Agency employees' participation in career	December 2016

development activities, including trainings, details, and e-learning to determine whether participation in such programs impacts the probability that individuals will apply for and qualify for senior grade positions.	
4. The Office of Human Resources will ensure full implementation of the new learning management system.	September 2017
5. The Office of Human Resources will create a tool or process to assess effectiveness of career development activities in the Learning Management System.	March 2018
6. The Office of Human Resources/Executive Resources Division (OHR/ERD), will continue to provide training to Agency employees interested in applying to the SES; this will include panel discussions with current agency SES managers to develop those in the feeder pool, ERD will conduct at least two such training sessions by September 2016.	September 2017

REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:

In FY 15, the Office of Diversity, Advisory Committee Management and Outreach collaborated with the OHR/ERD to present two training sessions on the Senior Executive Service application process; the training also included a panel discussion with current agency SES managers answering questions on their experiences as Senior Executives at EPA.

Although OCR and OARM/OHR have not fully developed a process for collecting and analyzing more detailed information on internal applicants to SES vacancies, EPA did collaborate, in March 2015, with the DOT to participate in the Treasury Executive Institute's SES CDP. The position was advertised for 30 days in USAJobs yielding 239 EPA/329 External Agency applicants. The 568 federal and non-federal applications were reviewed by the EPA's OARM/Executive Resource Board using the DOT's CDP process where 367 met minimum qualifications; and 53 were found highly qualified; the 53 highly qualified candidates participated in structured interviews resulting in 27 highly qualified candidates selected; 23 of the 27 were identified as EPA employees which represents 74%. EPA selectees from the Regions represented 30% while selectees from Headquarters represented 55%; additionally there were four non-EPA selectees representing the remaining 15%. EPA selectees' participation is as follows:

In FY 16, EPA estimates that its launch of the EPA Talent Management System to track and report employees' participation in career development opportunities, including trainings, details, and e-learning will assist in these processes.

Thereafter, in FY 18, EPA plans to create a tool to evaluate the effectiveness of career development activities tracked in the Learning Management System.

PART I-5: Individuals with Targeted Disabilities

**STATEMENT OF
CONDITION THAT WAS
A TRIGGER FOR A
POTENTIAL BARRIER:**

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

Participation Rate of People with Disabilities:

Data comparisons between FY 14 and FY 15 indicated that the total EPA workforce decreased by 339 (2.13%) full/part time temporary and permanent employees and the total number of individuals with targeted disabilities decreased from 378 (2.38%) to 364 (2.34%). The percentage of Persons with Targeted Disabilities surpassed the Administration's goal of 2%.

BARRIER ANALYSIS:

Provide a description of the steps taken and data analyzed to determine cause of the condition.

The Agency completed Part J of this report and noted that the total number of individuals with targeted disabilities in the EPA workforce declined from 378 in FY 14 to 364 in FY 15.

In particular, the representation of individuals with targeted disabilities decreased by 14 people or a percentage of 1.68%. Additionally, the total percentage of qualified individuals with targeted disabilities decreased from 2.38% to 2.34%.

**STATEMENT OF
IDENTIFIED BARRIER:**

Provide a succinct statement of EPA policy, procedure or practice that has been determined to be the barrier of the undesired condition.

The National Disability Employment Program Manager, Office of Human Resources and Office of Diversity, Advisory Committee Management and Outreach worked in collaboration to identify possible reasons that may have contributed to the decrease in the representation of individuals with targeted disabilities from FY 15.

The data suggest that EPA should periodically examine: The uniform use and training on Schedule A Hiring Authorities for Persons with Disabilities and 5 Code of Federal Regulations 213.3102 (u), including topics such as the conversion of Schedule A appointees to competitive status when appropriate.

OBJECTIVE:

State the alternative or revised Agency policy, procedure or practice to be implemented to correct the undesired condition.

EPA will continue its analysis of the selection and retention rates of individuals with targeted disabilities to identify possible barriers and work towards collecting applicant flow data on persons with targeted disabilities.

RESPONSIBLE OFFICIALS:	Director, Office of Civil Rights Acting Assistant Administrator, Office of Administration & Resources Management Director, Office of Human Resources Deputy Civil Rights Officials	
DATE OBJECTIVE INITIATED:	February 15, 2015	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2017	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)	
1. The Office of Human Resources and Office of Civil Rights will analyze: 1) the uniform use and training on Schedule A Hiring Authorities for Persons with Disabilities and 5 Code of Federal Regulations 213.3102(u); 2) the availability of training programs on Schedule A use and requirements for applicants and managers; and 3) the gathering of applicant flow data to the extent possible.	September 2016	
2. The Office of Human Resources/Division of Recruitment and Employee Services (formerly Office of Diversity, Advisory Committee Management and Outreach), will compile a list of disability recruiting sources for Shared Service Centers to send copies of EPA job announcements published on USAJobs.	COMPLETED September 2016	
3. The Office of Civil Rights will provide training to management and Agency Local Reasonable Accommodation Coordinators throughout EPA on using Schedule A, Workforce Recruitment Program (WRP), and the Computer/Electronic Accommodation Program (CAP) tool kit, as well as on facilitating requests for reasonable accommodation for applicants and employees with disabilities.	September 2016	
4. The Office of Human Resources will establish a diversity committee to address hiring, advancement, and retention of persons with targeted disabilities.	September 2016	

REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:

In FY 2014/15, EPA met the government-wide 2.0% Persons with Targeted Disabilities (PWTD) Workforce goal two years in a row. In addition, the Agency accomplished several planned activities that support increased representation of PWTDs in the agency's workforce.

1. Specifically, in March 2015, the National Disability Program Manager provided trainings by request to Regions and Program Offices with topics related to Schedule A, Workforce Recruitment Program (WRP) and the Computer/Electronic Accommodation Program (CAP). OCR developed a training tool kit which included: 1) defining a disability and targeted disability; 2) ABCs of Schedule A for hiring managers, human resources specialists, and disability program managers; 3) the Workforce Recruitment Program (WRP) for Students with Disabilities; 4) the OPM-Max program database containing experienced applicants with disabilities; 5) the Computer/Electronic Accommodation Program (CAP) provides assistive technological accommodations in the workplace for people with disabilities; and 6) disability law with federal focus based on the Rehabilitation Act of 1973 and the Americans with Disabilities Act Amendments Act of 2008 (ADAAA).

In addition, agency-wide training was provided to SEPMs on how they can assist hiring managers through briefings and brown-bag luncheons on topics related to hiring Persons with Targeted Disabilities (PWTD).

The Agency will consider alternative methods to increasing participation rates of PWD. The Office of Administration & Resources Management is exploring ways to further enhance outreach and recruitment efforts including establishing specific goals that will positively impact increased participation of PWTD, consistent with Executive Order 13548. The anticipated reorganization will enhance the agency's abilities to recruit, hire and plan for all potential full-time employees where possible. The Agency will encourage greater use of Schedule A hiring by hiring managers and human resources professionals.

2. In April 2015, the Office of Diversity, Advisory Committee Management and Outreach and Shared Service Centers collaborated on the development and implementation of a list of disability recruiting sources that would receive notifications of EPA job announcements published on USAJobs.gov.
3. The Office of Human Resources updated the guide on hiring flexibilities and authorities and ensured that the updated information is broadly distributed to EPA selecting officials.

OHR implemented plans to market the development and benefits of individual development plans to employees and supervisors. OHR also helped to educate and inform Project Officers nationally on Schedule A and other hiring flexibilities and authorities for

People with Disabilities at several meetings through Video Tandberg Conferencing (VTC).

OHR distributes all vacancy announcements to organizations that support the employment of PWTDs such as colleges, universities, job fairs, on EPA website and on USAJobs. This outreach is ongoing throughout the year to these stakeholders and groups.

4. In FY 15, the Agency provided trainings on the disability toolkit in January, February and March of 2015 for three regional offices and OSWER managers. The tool kit encompasses brief reminders on the definition of qualified individuals with a Disability or a Targeted Disabilities; the ABCs of Schedule A Hiring Authorities for hiring managers, HR professionals and disability program managers; the Workforce Recruitment Program for College Students with Disabilities (WRP); the Computer /Electronic Accommodation Program (CAP) which provides assistive technological accommodations in the workplace for persons with disabilities needing a reasonable accommodation; disability law with a Federal focus; the Rehabilitation Act of 1973; and the Americans with Disabilities Act Amendments Act of 2008 (ADAAA).

EPA Special Emphasis Program Managers were trained via monthly conference calls on how to give briefings and brown bag luncheons to managers on the WRP and Schedule A Hiring Authorities in the regions and at headquarters. This type of training set out to assist managers and supervisors on how to locate and hire highly qualified college students with disabilities in all academic fields and disciplines and to provide employment opportunities to students with disabilities. These trainings will continue in FY 16.

5. Although not offered in FY 15, the process of resurvey was conducted agency-wide in the People Plus payment system to allow the workforce to self-identify changes to their disability status at the end of FY 14. As a result, there was an increase from 201 (1.18%) to 378 (2.38%) EPA employees identified with a targeted disability. EPA data analysis indicates a decreased participation for persons with targeted disabilities at a new rate of 364 (2.34%). This is a rate change of 3.70% for PWTD.

Support through the Reasonable Accommodation Program

The Reasonable Accommodation Program developed a comprehensive, user-friendly electronic case activity and document management system in order to ensure the prompt, effective, efficient and consistent handling and resolution of EPA's RA requests. This system was purchased late in the fiscal year, however, implementation is expected for December.

The RA Program implemented a series of reasonable accommodation templates developed and refined in order to improve the timeliness, efficiency and consistency of communications to requesters as well as decision-making officials of reasonable accommodation requests. A new RA SharePoint site was also developed in June. These templates are currently on the SharePoint site for LORACs to use.

The Office of Civil Rights and the Office of Environmental Information developed video training module on Reasonable Accommodation and Section 508 that will be available to all EPA employees. This new training delivery will save time, cost and ensure on-demand availability. The video is currently on OCR RA intranet which can be accessed at any time.

The NRAC and Section 508 Coordinator conducted the first Community Forum for Section 508 Executive Council in October 22, 2014, which approximately 80 people attended.

The NRAC and Section 508 Coordinator provided one (1) RA/Section 508 Training for Region 9. The course was attended by 28 managers/supervisors.

The RA Program, in coordination with RTP EEO Director, provided webinar training for 28 new EEO Counselors in FY 15.

Other areas of success include:

- Finalized documents related to the Reasonable Accommodation Internal Tracking System (RAITS) Security/Privacy Act.
- RA training throughout FY 15 to select offices/programs.
- Redesigned RA webpage to include links to RA resources available to employees.

The Acting NRAC continued to serve as co-chair of the Training and Outreach subcommittee of the Section 508 Executive Council and implemented a variety of training opportunities for EPA managers, supervisors and employees. Issuance of the RA/Section 508 Video Training Module made available on OCRs RA intranet.

LORAC certification training was conducted for four new LORACS and backup LORACs from Regions 5 and 6 in FY 15.

During FY 15, the Agency processed a total of 223 requests for reasonable accommodation. The following is a summary and analysis of these requests:

- A total of 204 of the 223 requests (or 91.5%) were processed and concluded in FY 15;
- 144 of the 223 (or 64.6%) were approved
- 17 of the 223 (or 7.6%) were denied
- 32 of the 223 (or 14.3%) were withdrawn by the employee
- 6 of the 223 (or 2.7%) were denied under reasonable accommodation but with some relief offered outside of the reasonable accommodation process
- 1 of the 223 (or .4%) was terminated
- 2 of the 223 (or .9%) retired
- 1 of the 223 (or .4%) was closed (no response from employee)
- 1 of the 223 (or .4%) passed away
- A total of 17 of the 223 (or 7.6%) remain in pending status. A total of 2 of the 223 (or .9%) are in a delayed status.

The Agency processed 208 of the 223 requests (or 93.3%) within the time frames identified in both the AFGE National Reasonable Accommodation Procedures (NRAP) and the EPA Reasonable Accommodation Procedures. The Agency has attained the 90% processing rate for the fifth consecutive year in compliance with the requirements outlined in MD 715.

EEOC FORM 715-01 PART J	<i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT Special Program Plan for the Recruitment, Hiring, and Advancement of Persons With Targeted Disabilities						
PART I Department or Agency Information	1. Agency	1. US Environmental Protection Agency					
	1a. 2 nd Level Component	1a. N/A					
	1b. 3 rd Level or lower	1b. N/A					
PART II Employment Trend and Special Recruitment for Persons With Targeted Disabilities	Enter Actual Number at the ...	Start 10-1-2014		End 9-30-2015		Net Change	
		Number	%	Number	%	Number	Rate of Change
	Total Work Force	15,905	100.00%	15,566	100.00%	-339	-2.13%
	Reportable Disability	1,122	7.05%	1,132	7.27%	10	0.89%
	Targeted Disability*	378	2.38%	364	2.34%	-14	-3.70%
	* If the rate of change for persons with targeted disabilities is not equal to or greater than the rate of change for the total workforce, a barrier analysis should be conducted (see below). Please see Part I9.						
	1. Total Number of Applications Received from Persons With Targeted Disabilities during the reporting period.					Data not available	
	2. Total Number of Selections of Persons With Targeted Disabilities during the reporting period.					Data not available	

Part V**Goals for Targeted Disabilities*****Hiring Goals***

EPA has established a goal to maintain at least 2.0% representation in the total workforce for people with targeted disabilities by the end of 2016. As of 10/1/14, EPA surpassed the federal goal for the first time with a 2.38% rate of participation for people with targeted disabilities. A survey was conducted agency-wide in the People Plus payment system to allow the workforce to self-identify any changes in their disability status as of the end of FY 14. As a result, there was an increase from 201 (1.18%) to 378 (2.38%) EPA employees identified with a targeted disability. In FY 15, employees were not asked to participate in a survey. EPA data analysis indicates a decreased participation for persons with targeted disabilities at a new rate of 364 (2.34%). The Office of Personnel Management adjusted the codes used to capture employees with targeted disabilities in accordance with the statutory language of the ADAAA of 2008. If the EPA is to maintain 2.38%, it must apply strategic methods to outreach, recruitment and retention due to the continued shift in workforce. At the end of FY 15 there were 10 new hires of people with targeted disabilities at EPA, a 1.06% rate of participation.

(Source: VP715B08)

Recommendations and Goals

EPA's policies and practices regarding Schedule A appointments may be modified to ensure that: 1) managers have a better understanding of this appointing authority; 2) managers evaluate Schedule A appointees' performance to determine whether conversion to the Competitive Service is appropriate; 3) Schedule A appointees have a better understanding of what career status means in the federal personnel system; and 4) Schedule A appointees have notice of their excepted service status by their managers via Human Resources.

PART K: Summary of EPA Best Practices

EPA considers the following to be noteworthy best practices of our Agency:

- The FY 2014-2018 Strategic Mission, which prioritized the attraction of employees with diverse backgrounds and perspectives, who are positioned to effectively accomplish the Agency's mission and meet evolving environmental and sustainability challenges.
- The Agency utilizes diverse interview/hiring panels for SES positions to ensure candidates are evaluated in a fair and consistent manner. These panels contain peers from different offices and positions.
- The Agency continues to strengthen its partnerships with Minority Serving Institutions and HBCUs. These partnerships allow for continual practice for diverse applicant outreach. The Agency also helps students prepare for federal jobs by hosting Career Fairs, and resume building workshops.
- The Agency continues to promote the use of its Leadership Development, temporary promotions/details and other developmental trainings, and mentoring programs to enhance diversity of participant pools and to raise its employee's skills.
- The Office of Administrator (OA) formed the Workforce Engagement (WE) Workgroup to increase employee engagement within OA. The WE identified 7 areas of employee concerns and is looking into potential solutions and/or improvements to recommend to senior management to alleviate or mitigate these concerns.
- The Office of Administration and Resources Management (OARM) conducted SES 101 Training sessions for its GS 13 -15 employees. OARM also disseminated job announcements to all entities included on its recruitment source list, including Minority Academic Institutions, and external stakeholders in accordance with the Standard Operating Procedure developed in FY 13.
- The Office of International Tribe Affairs has created a Diversity Action and Quality of Work of Life Council (DAQWL). The Council develops trainings to raise communication between management and staff and also to raise awareness of Skills Marketplace trainings. The Council has sought to improve how management communicates monetary and time-off awards information to staff.
- The Office of Solid Waste and Emergency Response scheduled a training session to train staff on "How to Develop Individual Development Plans."

PART K: Summary of EPA Best Practices

- The Office of the Chief Financial Officer provided Leaders and Learners Collaborative Mentoring training for managers and staff.
- The Office of Chemical Safety Pollution Prevention (OCSPP) continues to financially support and actively participate in the Leaders and Learners Collaborative Mentoring Program throughout the year. OCSPP funded 50 slots. Additionally, OCSPP provided managers and supervisors several LER trainings.
- The Office of Environmental Information developed and implemented its FY 14/15 Talent Management Action Plan to achieve numerous goals, including to ensure that employee development is planned, structured, and systematic—yet flexible to address organizational and individual needs.
- The Office of Air and Radiation created a rotational opportunity for staff to fill vacated supervisory positions to support employee development.
- The Office of General Counsel provided several internal opportunities through the interdivisional opportunities database for employees to acquire skills and perform duties at a higher level in the organization.
- The Principal Deputy Assistant Administrator of the Office of Enforcement and Compliance Assurance (OECA) appointed two senior executives to champion the development and implementation of a training program for OECA managers and supervisors. The subject of the training included EEO laws, regulations, rights, duties and responsibilities to promote best workplace practices.
- The Office of Chemical Safety and Pollution Prevention funded 25 mentee and mentor slots in the program and held a flash mentoring program this year with employees of all levels participating, including the Assistant Administrator.
- The Office of Water (OW) in response to the Agency's hiring initiative, OW's Deputy Civil Rights Official (DCRO) required all of its program offices to develop a comprehensive recruitment and outreach plans. Job announcements were only permitted to proceed following the DCROs approval of the plans. The office also fully utilized the Agency's guidance on hiring panels. This combined approach has resulted in more diverse applicant pools and selections of permanent hires across all RNO groups.

PART K: Summary of EPA Best Practices

- The Region 1 Diversity Steering Committee was convened to study and offer recommendations to expand the diversity of the Region's leadership feeder pool (that is, staff in grades GS-13 and above. The committee created career development programs that help increase diversity of the Regions leadership feeder pools and for administrative staff in Grades 11 and below.
- The Region 2 Leadership Development Program (LDP), which provides opportunities for leadership development in an array of programs to enhance diversity, had more than 40 employees participate in the FY 13/14 LDP.
- Region 3 has created a consistent post-interview feedback form and developed a Nuts-Bolts Training sessions for managers on Hiring Authorities.
- Region 4 worked with HQ committee to develop online disability training for managers and staff. Additionally, Region 4 provided two Workforce Recruitment Program (WRP) and encouraged management use of WRP focused educational resource to increase awareness of careers available with the EPA; through classroom, webinars and online training.
- The Region 6 launched a model Leadership Development Program (LDP) in 2006, which provides opportunities for leadership development for all Region 6 employees in all program areas. The application and selection processes require interest, satisfactory performance, and supervisory approval. The Training Coordinator and Special Emphasis Program Managers assist Managers to further promote the LDP within their constituencies as a tool for professional development. Since 2005, Region 6 has provided leadership development training to over 50% of its staff and 70% of its managers
- The Region 7 EEO Officer and Office of Regional Counsel partnered with the headquarters Office of Human Resources and Public Affairs to review its recruitment and outreach strategy. The updated strategy utilizes social media to facilitate outreach activities prior to the job's announcement.
- Region 7, after a selection has been made, Region 7 uses regional civilian labor force data to assess the quality of its recruitment efforts.
- Region 8 held nine "How to Apply for Federal Jobs" webinar sessions open to EPA employees and the public.

PART K: Summary of EPA Best Practices

- Region 9 partnered with a non-profit organization that serves individuals with disabilities to place a Person with Disability into an internship position to gain federal work experience. Region 9 also host multiple Mentoring programs, leadership development programs and Executive Leadership Programs.
- Region 10 conducted individual meetings with supervisors prior to the announcement of positions to determine if: 1) it is conducive to a person with a targeted disability; 2) outreach should be conducted; and 3) Schedule A hiring authority is appropriate.